

**From:** [Williams, Kenneth J.](#)  
**To:** [Maria.h.hunger@navy.mil](mailto:Maria.h.hunger@navy.mil)  
**Subject:** Capstone Checklist  
**Date:** Thursday, May 5, 2016 2:11:16 PM  
**Attachments:** [capstone-checklist.docx](#)

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## Capstone Planning Checklist

This checklist will assist agencies with planning and implementing a Capstone approach at their agency.

There are various ways to implement a Capstone approach. Agencies should develop an implementation plan for a Capstone approach that meets their business and legal needs. Federal agencies are encouraged to consider Capstone as an approach that may help them meet the requirements of section 1.2 of the Managing Government Records Directive (M-12-18), which states that agencies will manage all email electronically by December 31, 2016.

### Current Email Management Program

My agency's current email management:

- ☐ yes ☐ no Practices and policies are compliant
- ☐ yes ☐ no Storage capacity is affected by legacy email
- ☐ yes ☐ no Legacy email is managed
- ☐ yes ☐ no Solution meets our business needs and requirements
- ☐ yes ☐ no Solution complies with M-12-18

If you answered "no" to any of the above, then a Capstone approach should be considered.

### Agency Stake-Holder Involvement

Which agency stakeholders listed below should be involved in the planning and implementation of a Capstone approach?

- ☐ Senior Agency Official (SAO) for Records Management
- ☐ Agency Records Officer
- ☐ Departmental Records Officer, if applicable
- ☐ Chief Information Officer
- ☐ General Counsel
- ☐ FOIA Office Representative
- ☐ Privacy Office Representative
- ☐ NARA Appraisal Archivist
- ☐ Other Stakeholders, e.g. Procurement Staff

### Legal Considerations

Does my agency's Capstone approach:

- ☐ yes ☐ no Conflict with other regulations and/or requirements
- ☐ yes ☐ no Address FOIA requirements
- ☐ yes ☐ no Address Privacy Act requirements
- ☐ yes ☐ no Mitigate my General Counsel's concerns regarding Capstone implementation
- ☐ yes ☐ no Other

## Capstone Approach Scope

My Capstone implementation scope will apply to:

- ☐ The entire agency
- ☐ Only specific offices and/or regions

*And*

- ☐ Legacy email accounts
- ☐ Day forward email accounts
- ☐ A specific email platform or email archiving solution

## Implementation Factors

My system/technology in use for our Capstone approach:

- ☐ yes ☐ no Identifies permanent and temporary accounts
- ☐ yes ☐ no Manages and updates account designations
- ☐ yes ☐ no Supports transfer requirements for permanent records
- ☐ yes ☐ no Supports disposal requirements for temporary accounts

If “no”, can all of the above be accomplished manually or through a combination of automated and manual policies and processes?

My agency has supported a Capstone implementation rollout by:

- ☐ Updating and issuing agency policies
- ☐ Developing and conducting agency-wide training
- ☐ Other

## Specific Records Management Considerations

My agency’s Capstone approach will allow (check all that apply):

- ☐ Manual end-user culling (e.g., deletion of non-record material)
- ☐ Automated culling using technology
- ☐ No culling
- ☐ Manual end-user categorization (e.g., non-record to record)
- ☐ Automated categorization using technology
- ☐ No categorization

## General Considerations

My agency’s Capstone approach takes into account:

- ☐ Continued requirements to cross-file email with related records (e.g., case file)
- ☐ Email may be kept longer than necessary
- ☐ Email may be kept shorter than necessary
- ☐ All content in email accounts designated as permanent will be transferred to NARA
- ☐ All content, including personal, in email accounts will be considered record
- ☐ Other

**From:** [Williams, Kenneth J.](#)  
**To:** [Warren, Tremell](#)  
**Subject:** Draft Capstone Brief  
**Date:** Friday, May 6, 2016 3:19:00 PM  
**Attachments:** [NLRB Records Management Brief Draft.pptx](#)

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Sir,

I may be a little overzealous, but I wanted to get started with something this week. This is rough draft of my thoughts about implementation of Capstone here NLRB.

R/Ken





#### Wagner Act of 1935



- Prohibited employers from engaging in a variety of unfair labor practices
- Created the National Labor Relations Board (NLRB)

# Records Management CAPSTONE



# Executive Overview

Wagner Act of 1935



- Prohibited employers from engaging in a variety of unfair labor practices
- Created the National Labor Relations Board (NLRB)

## Nature of Brief

- Decision brief
- Decision Level ( )
- Source Documents:
  - OMB MEMO 9-15-14(M -14-16)
  - NARA Bulletin 2013-12
  - NARA Records Directive (M-12-18)

## Problem Statement / Issue

- Brief Senior Leadership on use of non-official email accounts
- Implementation of CAPSTONE policy

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## Background/Actions to Date

- NARA Bulletin 2013-2 issued requirement for CAPSTONE
- Regions will be required to formulate a CAPSTONE policy
- Email guidance outlined in NARA Bulletin 2011-03

## Recommendation

- Brief Senior Leadership on use of non-official email accounts.
- Approve CAPSTONE for selected officials



# Discussion

Wagner Act of 1935



- Prohibited employers from engaging in a variety of unfair labor practices
- Created the National Labor Relations Board (NLRB)

- Purpose: To identify NLRB email records to be captured using “Capstone” Approach (to include email attachments, calendar appointments, tasks, and chat transcripts)
- Background: OMB M-12-18/NARA 2013-02 requires Federal Agencies to manage email in a system that supports records management and litigation. This includes the ability to search, retrieve, and store temporarily and long term. This guidance also addresses recordkeeping requirements for personal or non-AGENCY communications tools to conduct AGENCY business(text/twitter). The Capstone approach will be restricted to Heads of Office/Regions and or those that are likely to receive permanent email records based on there roles/responsibilities.



# Discussion

Wagner Act of 1935



- Prohibited employers from engaging in a variety of unfair labor practices
- Created the National Labor Relations Board (NLRB)

## Non-Official Email Accounts

(b) (5)

[Redacted text block]

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(b) (5)

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# Discussion

Wagner Act of 1935



- Prohibited employers from engaging in a variety of unfair labor practices
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## Capstone Overview

Use of the CAPSTONE approach is a recommended based on guidance by the National Archives

Requires senior policy and decision making personnel, designated as CAPSTONE officials, to capture and retain ALL emails on their hard drive as permanent records. (Political Appointees, Heads of Offices, Deputies, Assistants, Principles Regional Officials)

Email of all other federal employees are scheduled as temporary, with authority for eventual destruction

CAPSTONE affords flexibility, allowing agencies to design an approach that fits their technology, business needs, and culture without any additional resource or manning cost.

The Initial CAPSTONE schedule begins the process of aligning email management with a future **NLRB CIO policy** on preservation of the email records of senior leadership.

Regional activities will develop and submit their CAPSTONE recommendation to NLRB (Official) for approval and provide guidance to Sub-Regional Offices for their approach(? Is this a realistic expectation)

Further guidance and training will be provided to all CAPSTONE officials in the future as the program execution matures



# Proposed CAPSTONE

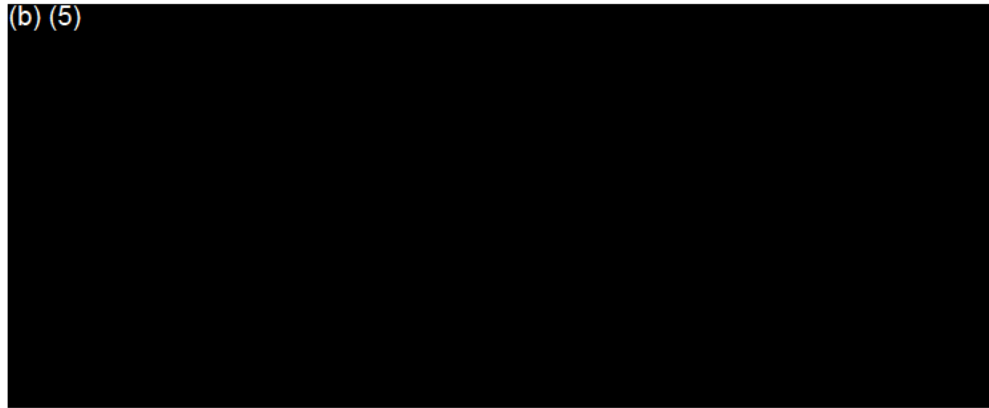
Wagner Act of 1935



- Prohibited employers from engaging in a variety of unfair labor practices
- Created the National Labor Relations Board (NLRB)

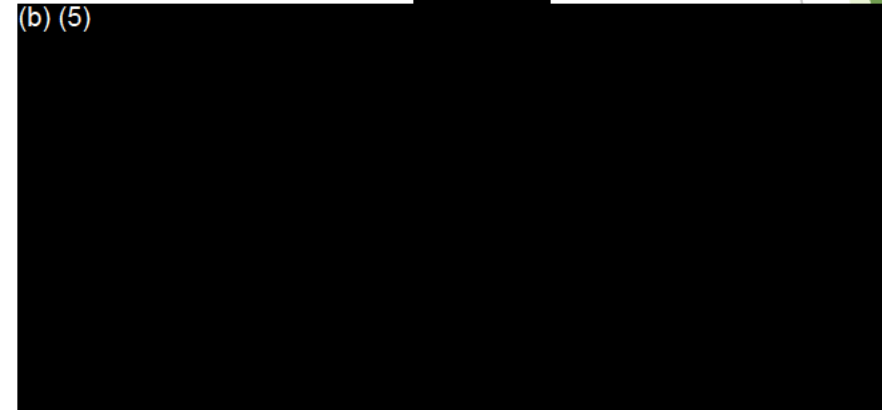
## EX, IG, Op's Mgt

(b) (5)



## Solicitor, EEO, and All HQ Heads of Office

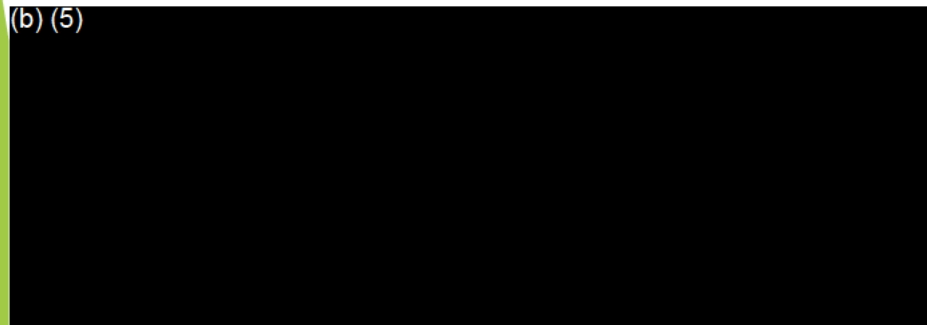
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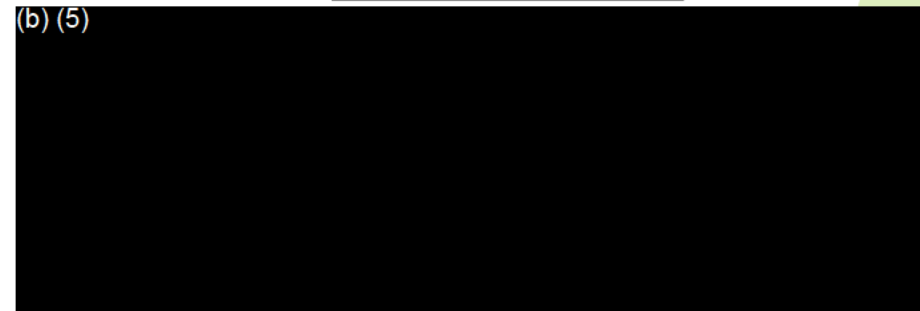
## All Regional Heads of Office

(b) (5)



## Apply Regional model to Sub-Region Heads of Office

(b) (5)







# Records Management

Wagner Act of 1935



• Prohibited employers from engaging in a variety of unfair labor practices  
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## Capstone implementation consideration factors

- Consultation with NLRB OCIO, OGC, and other agency decision makers
- Is the proposed Capstone approach compatible with NLRB's current email and records management/archiving systems?
- Does the current email repository capture metadata required in 36 CFR 1236.22, (<https://www.gpo.gov/fdsys/pkg/CFR-2010-title36-vol3/pdf/CFR-2010-title36-vol3-sec1236-22.pdf>)  
Can it be configured to do so?
- Does NLRB repository security controls for prevention of unauthorized access, modification, or deletion of email records?
- Can NLRB technology be configured to allow future designated Capstone officials to remove or delete personal and non-record emails from permanent capture? If not, will potentially capturing personal and non-record messages in Capstone accounts acceptable?
- Will new NLRB policies addressing FOIA, discovery, IT security, and other issues need to be developed to implement Capstone?
- What are the training requirements?
- How long will the designated Capstone officials emails be kept?
- Will Capstone emails be kept in a duplicate system?
- Will some Capstone emails be legally required to be disposed of after a specific time?
- Once NLRB Capstone accounts are identified will we apply the Capstone approach to legacy email accounts?



# Records Management



## Wagner Act of 1935



- Prohibited employers from engaging in a variety of unfair labor practices
- Created the National Labor Relations Board (NLRB)



**From:** [Williams, Kenneth J.](#)  
**To:** [Mira, Robert](#)  
**Cc:** [Warren, Tremell](#)  
**Subject:** Email/Capstone  
**Date:** Wednesday, May 11, 2016 2:10:00 PM

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Mr. Mira,

I have been tasked with implementing a CAPSTONE approach to managing agency email for certain designated Officials. CAPSTONE is a new approach to managing the emails of NLRB Designated Officials based on their positions, level of work/responsibilities. This approach consists of archiving what we will consider permanent email records and appropriately dispositioning temporary email records. If possible I would like to meeting with you next week to discuss a few items to determine how CAPSTONE can be in deployed at NLRB. Some of those items are;

1. Can we identify separate accounts by user or office?
2. Can we update account information when an NLRB employee leaves, change offices, etc.?
3. What is our current email platform and storage capacity?
4. Can we separate or flag what will be eventually designated as permanent and or temporary email accounts?
5. Can we dispose of accounts that will be designated as temporary?
6. Will be able to transfer email designated as permanent accounts to the National Archive Records Agency (NARA)?
7. Can we search within and across NLRB email accounts?
8. Does our current email system archive emails automatically or must it be done manually?
9. Is culling options available (Auto/Manual)?
10. What is the current NLRB policy on personal use of agency email accounts?
11. What is our current policies on use of personal accounts to conduct agency business?

If you can provide about 30mins of your time based on your availability next week, it would be greatly appreciated.

R/Ken Williams

**From:** [Williams, Kenneth J.](#)  
**To:** [See, Rachel](#)  
**Subject:** Agency Implementation of NARA "Capstone" Approach to Managing Email  
**Date:** Friday, May 20, 2016 11:44:00 AM

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Ms. See,

Are you available to discuss the way forward in regards to the implementation of Capstone Monday or Friday of next week? Days between, I'm busy with attendance at a NARA Forum and other issues. If those dates are not good please propose some dates during the first week of June if you are available. I located the Memorandum that you and Stacie drafted and I'm anxious to discuss with you my thoughts regarding the next steps and any recommendations you may have.

R/Ken Williams

**From:** [Williams, Kenneth J.](#)  
**To:** [James Cassedy](#)  
**Cc:** [Mira, Robert](#); [Warren, Tremell](#)  
**Subject:** Capstone Data Transfer  
**Date:** Tuesday, July 5, 2016 7:40:00 AM

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Mr. Cassedy,

As NLRB progressively plan our Capstone approach, a few questions arise in regards to disposition of the emails that are captured. The questions are as follows:

- a. How will the emails be transmitted/delivered to the Federal Records Center and what will be the frequency (monthly, yearly)?
- b. What format will the transmitted data be required to be in, electronically or hard copy?
- c. Is there a way that we can conduct a data transfer test?

Your assistance with providing answers to these questions will be greatly appreciated. Thanks in advance.

Respectfully,

Ken Williams  
NLRB Records Officer

**From:** [Warren, Tremell](#)  
**To:** [Aburvasamy, Prem](#); [Sanders, Laurie](#); [Pojeta, Thomas J.](#)  
**Cc:** [Williams, Kenneth J.](#)  
**Subject:** Capstone Policy  
**Date:** Wednesday, July 27, 2016 4:13:48 PM  
**Attachments:** [Capstone Tier hold cycle.pdf](#)  
**Importance:** High


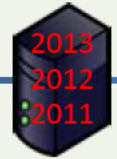


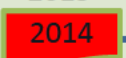







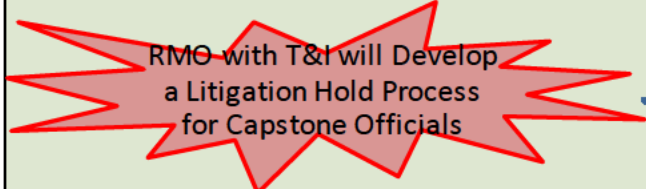



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All,

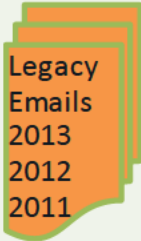

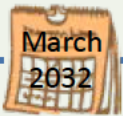
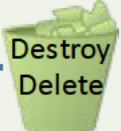


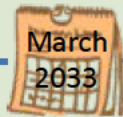
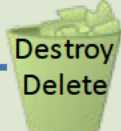


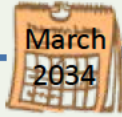
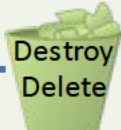
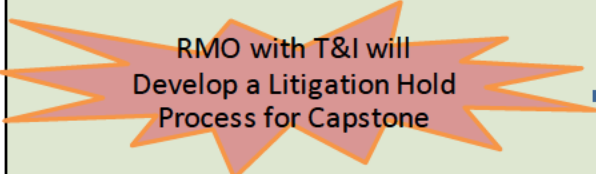



attached is an example of capstone email policy from another Agency.

Thanks  
Tremell

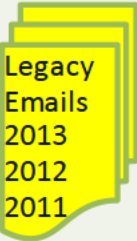


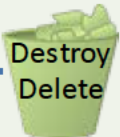


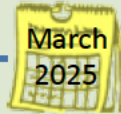
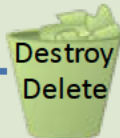
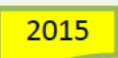

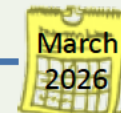
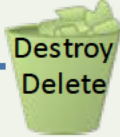
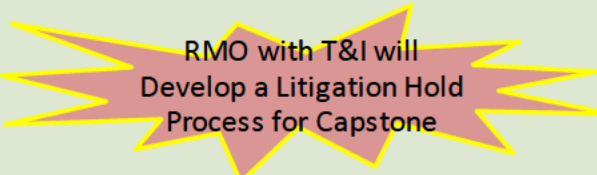



# Capstone Officials Permanent Email Tier 1 (15yrs.) Sample Starting March 2017

Outlook View Window User Inbox	Archived/Inactive		Disposition Date	Disposition	
	Archived Inactive Date	Retention Timeframe		Temporary Destroy Delete	Permanent Transfer NARA
2016 2015 2014  Legacy Emails 2013 2012 2011 Transfer to Archive Storage	Archived on March 2017 	Retain 15 Years			
2017 2016 2015  2014 Transfer to Archive Storage	Archived on March 2018 	Retain 15 Years			
2018 2017 2016  2015 Transfer to Archive Storage	Archived on March 2019 	Retain 15 Years			
   Holds do not Stop Capstone Officials Transfer to NARA 					




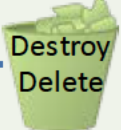



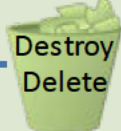
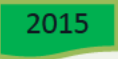

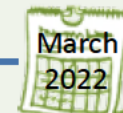
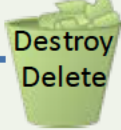
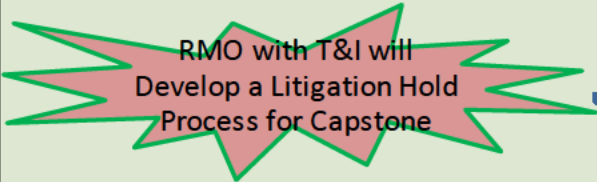



# Capstone Temporary Email Tier 2 (15yrs.) Sample Starting March 2017

Outlook View Window User Inbox	Archived/Inactive		Disposition Date	Disposition	
	Archived Inactive Date	Retention Timeframe		Temporary Destroy Delete	Permanent Transfer NARA
2016 2015 2014  Transfer to Archive Storage	Archived on March 2017 	Retain 15 Years			
2017 2016 2015  Transfer to Archive Storage	Archived on March 2018 	Retain 15 Years			
2018 2017 2016  Transfer to Archive Storage	Archived on March 2019 	Retain 15 Years			
<div>            RMO with T&amp;I will Develop a Litigation Hold Process for Capstone         </div> <div>            Retain until Hold is removed then follow Tier Disposition         </div> <div>  </div> <div>  </div>					

# Capstone Temporary Email Tier 3 (7 yrs.) Sample Starting March 2017

Outlook View Window User Inbox	Archived/Inactive		Disposition Date	Disposition	
	Archived Inactive Date	Retention Timeframe		Temporary Destroy Delete	Permanent Transfer NARA
2016 2015 2014  Transfer to Archive Storage	Archived on March 2017 	Retain 7 Years			
2017 2016 2015  Transfer to Archive Storage	Archived on March 2018 	Retain 7 Years			
2018 2017 2016  Transfer to Archive Storage	Archived on March 2019 	Retain 7 Years			
<div>             Retain until Hold is removed then follow Tier Disposition             </div>					

# Capstone Temporary Email Tier 4 (3 yrs.) Sample Starting March 2017

Outlook View Window User Inbox	Archived/Inactive		Disposition Date	Disposition	
	Archived Inactive Date	Retention Timeframe		Temporary Destroy Delete	Permanent Transfer NARA
2016 2015 2014  Transfer to Archive Storage	Archived on March 2017 	Retain 3 Years			
2017 2016 2015  Transfer to Archive Storage	Archived on March 2018 	Retain 3 Years			
2018 2017 2016  Transfer to Archive Storage	Archived on March 2019 	Retain 3 Years			
<div>            RMO with T&amp;I will Develop a Litigation Hold Process for Capstone         </div> <div>            Retain until Hold is removed then follow Tier Disposition         </div> <div>  </div> <div>  </div>					



**From:** [Richard Schrader](#)  
**To:** [Williams, Kenneth J.](#)  
**Cc:** [Brett Freireich](#); [Coral Johnson](#)  
**Subject:** OpenText Follow Up  
**Date:** Thursday, August 11, 2016 3:00:56 PM  
**Attachments:** [OpenText M-12-18 Whitepaper.pdf](#)

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Ken

Thank you for your time today. We look forward to the call tomorrow.

Brett is copied on this for the invite you will be sending.

For my records, what is Robert's and Laura's last name?

Also, see the link below for a workshop next week that you may want to attend.

Rick

**Richard Schrader**

OpenText

703-774-7024

[www.opentext.com](http://www.opentext.com)

**Managing Government Records Training Workshop XII -  
Focus on December 2016 OMB/NARA eMail Retention  
Deadline** [http://www.potomacforum.org/content/managing-government-records-training-workshop-xii-%E2%80%93-focus-december-2016-ombnara-email#field-field\\_whatyouwilllearn-node-7074](http://www.potomacforum.org/content/managing-government-records-training-workshop-xii-%E2%80%93-focus-december-2016-ombnara-email#field-field_whatyouwilllearn-node-7074)

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# Take an Enterprise Approach to Meet Records Management Directive Deadlines

A comprehensive information governance program is the best way for Federal agencies to meet M-12-18 objectives while also reducing costs, improving security, and promoting transparency.

**S**everal recent high-profile incidents have revealed records problems at federal agencies. Some make national headlines, while others slip under the radar. They all demonstrate a disturbing lack of effective process and technology.

Here's a closer look at a couple of the more notable incidents:

- IRS officials informed Congress hard drives containing emails central to an investigation had been destroyed. The lack of a centralized approach to managing email documents as records contributed to the situation.

- The Department of State email controversy began in March, 2015, when it became widely known that during her tenure as United States Secretary of State, Hillary Clinton had used a private email server for official communications, instead of official State Department email accounts maintained on federal servers. Even though these emails were eventually turned over to the State Department, the perception that there was an attempt to keep information from the public continues to this day.

The common thread here is the lack of an enterprise-grade, policy-driven, reliable information management system to meet the requirements of federal records

management policy and the Federal Rules of Civil Procedure.

## NARA/OMB MANAGING GOVERNMENT RECORDS DIRECTIVE: M-12-18

The National Archives and Records Administration (NARA) and the Office of Management and Budget (OMB) had to act on a memorandum from President Obama calling for a move to

electronic recordkeeping. President Obama noted that, "When records are well managed, agencies can use them to assess the impact of programs, to reduce redundant efforts, to save money, and to share knowledge within and across their organizations. In these ways, proper records management is the backbone of open Government."

Subsequent to the Presidential Memo, NARA and OMB issued



M-12-18 in 2012. This directive calls on agencies to manage all email in an accessible electronic format by the end of 2016. It further requires agencies to manage all permanent records electronically by 2019.

Email records management is the first step toward the overarching goal of information governance for the enterprise. The goal of managing permanent records in entirely digital format by 2019 is aligned to a number of key federal government objectives such as World-Class Digital Services, including a Future Ready Workforce, Digital Government Strategy, Open Data Policy, and Cloud First for cloud-based storage and services.

By aligning CIO priorities and the Managing Government Records

be able to undertake a number of initiatives and requirements.

- Customer experience is the new lens through which agencies are looking at how they interact with the public. The key to constant improvement of the experience citizens have with government agencies is accessible and up-to-date information. To add new services, agencies must often call on new sources of data and information. These data sources must be properly managed under an Electronic Content Management (ECM) system to give agencies greater power to launch new services to improve the citizen experience. This is in part the charter of the U.S. Digital Service.

- Open data has been the policy throughout the Obama administration. Agencies are

governance strategy.

- Government CIOs are also dealing with myriad policies that pertain to content and information management—namely, cybersecurity, the Cloud First mandate, and datacenter consolidation. An information management strategy that includes a strong governance structure can help ensure the integrity and discoverability of data as it moves among physical infrastructures.

This is why the concept of electronic records management has evolved into the notion of Electronic Information Management (EIM). EIM takes a multidimensional view of agency records, including those “born” electronically, such as email, rulemaking documents, and legal briefs. It also encompasses the totality of electronic content such that records as disparate as agency financial records, procurement transactions, geospatial data, and so forth become part of the managed information resources. Beyond that, EIM takes in unstructured or non-traditionally structured sources of data that agencies generate such as data from the internet of things, video, and PDFs.

## LOOK TO THE FUTURE

Meeting the 2016 and 2019 deadlines requires careful planning and applying the right technology. It also requires a comprehensive approach to avoid future obsolescence. Adhering to M-12-18 should be more than an exercise in compliance for federal agencies.

Done properly, M-12-18 Information Governance Programs can bring greater transparency and efficiency to all agency business processes, especially when retrieving information and

## FUNDING AN ECM SYSTEM

**THE KEY TO GETTING FUNDING** for M-12-18 is to include it in programs that are already funded, such as cybersecurity, email consolidation and move to the cloud, Digital Government Strategy, Open Data Policy, IT modernization, and so on.

Agency CIOs can amend priorities such as Data Center Consolidation and Optimization, IT Shared Services, TechStat, and PortfolioStat to include information governance in a way that accelerates deploying an enterprise Information Governance program. This will meet the M-12-18 objectives while contributing to the success of all major programs.

Directive objectives, agencies can move towards the digital enterprise and realize its many benefits. The directive's larger goals include improving openness and accountability, while lowering costs and increasing agencies' operational efficiency.

The key word here is management. By actively managing electronic records, and not merely storing them, agencies can put themselves in a stronger position to

required to make data sets available in machine-readable for the public or anyone else in government that might need them. The open data policy calls on agencies to manage “government information as an asset throughout its lifecycle to promote openness and interoperability, and properly safeguard systems and information.” Lifecycle management, interoperability and security are benefits agencies can derive from a solid information



responding to FOIA requests, congressional inquiries, and legal discovery orders. Successful M-12-18 implementations will position federal agencies as stewards of the

often need material like email, policy memos, and action reports. Program execution generates policy documents, transaction data, and financial data. Records

either for three or seven years.

According to NARA, the Capstone approach also “optimizes access to records responsive to discovery or FOIA requests.” It stages email for eventual transfer to NARA. It also lowers the risk of accidental or deliberate email destruction. Capstone can help agencies meet the 2016 deadline in a manner that is transparent to users, defensible in courts, and responsive to FOIA requests and congressional inquiries.

## MEETING THE 2016 AND 2019 DEADLINES REQUIRES CAREFUL PLANNING AND APPLYING THE RIGHT TECHNOLOGY. IT ALSO REQUIRES A COMPREHENSIVE APPROACH TO AVOID FUTURE OBSOLESCENCE.

national shared history.

Information governance is an integral element of information management. It encompasses ECM, records management, and content lifecycle management. Properly implemented, an information governance program provides automated, transparent control over the increasing amounts of information agencies must manage. It should also fit seamlessly into the way people want to work. Agencies need to re-think the way they have implemented these systems in the past and look toward a new approach that is less complex to manage, simpler for agency employees and citizens, and easier to maintain over time.

A well-architected ECM system makes the right information easily available to the various agency stakeholders. It will ensure the information they generate is captured, tagged, and preserved according to government policy and in such a way that it is easily available in the context of the agency's processes and workflows.

For example, agency legal staffs

managers need to know they are receiving everything they should have under law and regulation. Agency CIOs must ensure agency official information in all forms doesn't end up in rogue systems or non-systems of records.

### A GOOD PLACE TO START

Given the volume of email and other agency records, NARA has recognized records management automation as the most practical way to determine what must be retained and for how long. For the 2016 deadline, agencies must electronically manage millions of emails. NARA has proposed an automated approach agencies can use called “Capstone.”

Capstone outlines a way to automate email management so agencies can avoid relying on users to decide which emails to retain. The automatic classification and scheduling under Capstone depends on the email account holder's role within the agency. Senior officials' email is saved permanently as a historical record. All other users' email is saved as temporary records,

### TAKE AN ENTERPRISE APPROACH

Given agency CIO priorities such as World Class Digital Services, Driving Value in Federal IT, and Protecting Federal IT<sup>1</sup>, the best practice to meeting the goals of the Managing Government Records Directive is a comprehensive enterprise approach that goes beyond Records Management.

A well-formulated, overarching information governance strategy does more than just preserve email and other documents as records. It also supports the move to digital government that will make agencies more efficient and secure. An enterprise strategy is needed to meet the needs of the agency's mission while also making it much easier to support the requirements of eDiscovery, FOIA, auditors, Congress, and the media.

Successful enterprise Information governance planning and implementation requires teamwork and multi-level support. Agency IT leaders must work with all stakeholders to ensure all requirements are met and plans don't result in soon-to-be obsolete systems.

For example, if an agency established an email-only approach for the 2016 deadline, it would have to replace that to

achieve 2019 mandates. That's short-sighted and a waste of taxpayer dollars. A better approach is to implement a solution for 2016 that is a first phase of a seamless, long-term solution.

The good news is agencies have already funded many of the programs critical to a long-term enterprise strategy. World Class Digital Services, Driving Value in Federal IT, and Protecting Federal IT are already government CIO priorities. It's important to see M-12-18 as a component of these already-funded programs, and not as simply a Records Management doctrine.

### OPTIMIZE INFORMATION GOVERNANCE WITH OPENTEXT™ CONTENT SUITE

OpenText Content Suite is the only comprehensive information management solution available as a single, fully integrated group of products. Already in use by federal, state, and local agencies, it provides a foundation for digital transformation to help departments meet their information management

requirements.

Content Suite is a new way of thinking about information management, governance, and productivity. It's an open system that can integrate with lead applications (such as SAP®, Oracle®, Microsoft® and Salesforce®) to aggregate, correlate, and share information across the organization.

In doing so, it seamlessly extends governance policies and processes to previously isolated silos by embedding automated classification capabilities into applications. Functions such as tagging and applying meta-data take place in the background. User adoption is no longer an issue as agency users don't have to change the methods or tools they already use to complete their work.

By creating a bridge to connect silos and applications, Content Suite changes the way users interact with information. Users can see information related to a case or initiative from multiple repositories through one simple interface. This dramatically increases insight, effective decision making, and

throughput; which also leads to increased process efficiency.

OpenText Content Suite Ensures anywhere, anytime, any device access to information and collaboration tools that meet the latest security and access standards. It enhances user productivity by providing role-based views through a simple, responsive user interface. That interface remains consistent across personal computers, tablets, and mobile devices. Users can set documents to display, but not store, on mobile devices.

Content Suite can securely and systematically collect, store, and deliver information across the often complex set of bureaus and offices that comprise an agency or department. It bridges agency boundaries and helps avoid the proliferation of incompatible or non-interoperable silos that limit information value. It helps create communities of interest defined by mission or type of data, such as intelligence or geospatial.

A powerful search function helps manage information for the high availability conditions of daily mission needs, program analysis, legal discovery and Freedom of Information Act (FOIA) requirements. Built-in functionality can locate specific types of data the agency might need to redact from FOIA requests, such as names, Social Security numbers, or other personally identifiable information.

### FOR MORE INFORMATION:

**National Archives and Records Administration (NARA) guidance:**

<https://www.archives.gov/records-mgmt/bulletins/2013/2013-02.html>

**NARA Capstone resources:**

<https://www.archives.gov/records-mgmt/email-mgmt.html>

**White House M-12-18 memo:**

<https://www.whitehouse.gov/sites/default/files/omb/memoranda/2012/m-12-18.pdf>

**White House 2014 memo on email archiving:**

<https://www.whitehouse.gov/sites/default/files/omb/memoranda/2014/m-14-16.pdf>

**OpenText:**

[http://campaigns.opentext.com/OMB\\_M-12-18](http://campaigns.opentext.com/OMB_M-12-18)

## OPENTEXT

For more information about  
OpenText, please visit  
[www.OpenText.com](http://www.OpenText.com).

**From:** [Aburvasamy, Prem](#)  
**To:** [See, Rachel](#); [O'Neill, Barbara A.](#); [Platt, Nancy](#); [Williams, Kenneth J.](#); [Warren, Tremell](#); [Pojeta, Thomas J.](#)  
**Cc:** [Mira, Robert](#); [Sanders, Laurie](#)  
**Subject:** RE: OMB Email Management Directive / Capstone - OCIO / Division of Legal Counsel coordination  
**Date:** Tuesday, October 18, 2016 3:45:29 PM

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Thanks Rachel. Please let me know if you need me to do anything.

---

**From:** See, Rachel  
**Sent:** Tuesday, October 18, 2016 2:30 PM  
**To:** O'Neill, Barbara A. <Barbara.O'Neill@nlrb.gov>; Platt, Nancy <Nancy.Platt@nlrb.gov>; Williams, Kenneth J. <Kenneth.Williams@nlrb.gov>; Warren, Tremell <Tremell.Warren@nlrb.gov>; Aburvasamy, Prem <Prem.Aburvasamy@nlrb.gov>; Pojeta, Thomas J. <Thomas.Pojeta@nlrb.gov>  
**Cc:** Mira, Robert <Robert.Mira@nlrb.gov>; Sanders, Laurie <Laurie.Sanders@nlrb.gov>  
**Subject:** RE: OMB Email Management Directive / Capstone - OCIO / Division of Legal Counsel coordination

Attached please find an updated "Action Items" document, which Ken and Nancy and I just finished updating.

--Rachel

<< File: Managing Email Records Electronically - Action Items 10-18.docx >>

Rachel V. See ([rachel.see@nlrb.gov](mailto:rachel.see@nlrb.gov))

Branch Chief, E-Litigation Branch, National Labor Relations Board

1015 Half St. SE, Washington DC 20570

(202) 273-3848

---

**From:** See, Rachel  
**Sent:** Wednesday, July 27, 2016 4:03 PM  
**To:** O'Neill, Barbara A. <Barbara.O'Neill@nlrb.gov>; Platt, Nancy <Nancy.Platt@nlrb.gov>; Williams, Kenneth J. <Kenneth.Williams@nlrb.gov>; Warren, Tremell

<Tremell.Warren@nlrb.gov>; Aburvasamy, Prem <Prem.Aburvasamy@nlrb.gov>; Pojeta, Thomas J. <Thomas.Pojeta@nlrb.gov>

**Cc:** Mira, Robert <Robert.Mira@nlrb.gov>; Sanders, Laurie <Laurie.Sanders@nlrb.gov>

**Subject:** RE: OMB Email Management Directive / Capstone - OCIO / Division of Legal Counsel coordination

All, thanks for a productive discussion.

Attached are (1) the Action Items document I circulated in paper form and (2) the NARA "Success Criteria" presentation.

--Rachel

<< File: Managing Email Records Electronically - Action Items.docx >>

<< File: Email Success Criteria 5-24-16.pptx >>

(The other "success criteria" document is: <https://records-express.blogs.archives.gov/2016/04/13/criteria-for-managing-email-records/> )

-----Original Appointment-----

**From:** See, Rachel

**Sent:** Wednesday, July 20, 2016 11:49 AM

**To:** See, Rachel; O'Neill, Barbara A.; Platt, Nancy; Williams, Kenneth J.; Warren, Tremell; Aburvasamy, Prem; Pojeta, Thomas J.

**Cc:** Mira, Robert; Sanders, Laurie

**Subject:** OMB Email Management Directive / Capstone - OCIO / Division of Legal Counsel coordination

**When:** Wednesday, July 27, 2016 3:00 PM-4:00 PM (UTC-05:00) Eastern Time (US & Canada).

**Where:** Conf Rm 4002 (12) A. Philip Randolph

### **Managing Email Records Electronically**

#### **OCIO / Division of Legal Counsel Coordination**

#### **July 27, 2016 Agenda**

1. Overview of OMB Directive 12-18-2
2. Overview of Capstone approach

3. Where the NLRB stands: NxGen is compliant (b) (5)

4. The path forward: Office 365 as the System of Record

5. Long-term issues: The move to ERM / ECM (deadline: 2019)

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## Managing Email Records Electronically

### Action Items – 10/18/2016

<b>Item</b>	<b>Status / Primary Responsibility</b>
Technical assessment regarding extending retention period of emails in Office 365 to 7 years.	Mira (OCIO)  Action items: Specific questions to be prepared (See); OCIO teams organizing.
VERIFY: Identify email records with greater than 7-year retention periods and verify whether we are in compliance with OMB directive for those records.	Williams (OCIO)  Action items: 7+ year record categories identified, but department-by-department analysis still necessary.
ASSESS: For email records with a retention between 3 and 7 years, assess whether we can manage these electronically outside of Office 365, within the required deadline. (Likely not.)	Williams (OCIO)  Action items: Records still being identified.
Assessment of existing email records: For every category of email records, determine whether we are managing these electronically, in compliance with the directive; assess existing SORNs and records management schedule; determine and execute necessary revisions.	Williams (OCIO)  Query: Are we meeting the NARA success criteria for records management if we update only APPM REC-2(A)? A: Yes, per Ken. Records schedule and SORNs are outside of scope.
Example: Are email records for Finance stored in their existing system, or are those records being managed separately (already in Office 365, or elsewhere)? <b><u>This assessment will likely lead us to identifying additional infrastructure needs.</u></b>	In progress; largely complete.
<b>Capstone</b>	
Revise prior Capstone memo and finalize recommendation regarding Capstone custodians	Rachel (Legal Counsel)  Complete: Pending review and approval by Deputy General Counsel
Prepare briefing for Executive Secretary and Chief	Rachel (Legal Counsel)

of Staff (and the Deputy GC and Chairman, who have already signed off)	Anticipated 1 <sup>st</sup> week of November; to be scheduled
Upon approval, prepare Capstone notices for schedules.	Williams (OCIO) / Legal Counsel
Determine (b) (5)	Legal Counsel Pending.
Determine additional training needs	Legal Counsel  Pending. Ops / EEO discussion re: NxGen scheduled.  OEEO: To be scheduled.
Obtain approval from GC and Chairman/Solicitor	Legal Counsel / OCIO
NEW: Discussion re: JCMS	Rachel (Legal Counsel)  Pending.
NEW: APPM REC-2(A) modification	Pending. See above.

**From:** [Williams, Kenneth J.](#)  
**To:** [Warren, Tremell](#)  
**Subject:** UPDATE - Records Management Items of Interest  
**Date:** Monday, March 6, 2017 9:33:00 AM

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## Records Management Items of Interest

### **Landover Warehouse**

1. Case Management: Have approximately 5 skids of Confidential Secretary files remaining in the warehouse. Last Thursday retrieve Confidential Secretary boxes for the years 2009, 2011, and 2012.
2. Records Management: Processed 57 Contempt Box's and will need 5 Contempt Box's label Litigation Hold to be reviewed by Ms. Barbara O'Neil. She has contacted and will review them this week. The current first floor inventory consist of 9 boxes of case cards (Tonya Tolson Project), and 21 mixed boxes of Regional Offices files, FRC (Recalled Records), Closed Board Files and some label Landover.
3. Identified 9 various forms that were stored in the warehouse that have been deemed obsolete by operations. The identified obsolete forms are being brought back and destroyed using our HQ Shred services.
4. A total of 77 boxes for the Board-Side Secretary boxes were prepared for transfer to NARA. The boxes are for D. Pleasant 21 boxes, C. Turner 25 and B. Dinkins has 31 boxes. Awaiting transfer number.
5. Processed 6 boxes of Department of Administration Old files (1935-1972) files for transfer to NARA. Awaiting transfer number.
6. We will be visiting the warehouse Tuesday, 7 March 2017 for weekly site inventory review.

### **Capstone (Email Management)**

1. Update PA on Capstone progress and implementation plan 3:30 – 4:00PM Thursday 9, 2017
2. In an attempt to avoid duplicate efforts, requested a copy of your draft service announcement regarding Capstone implementation from David Gaston on 28 February 2017. David notified me that they were still working on it, but was near completion, and he would circulate to me once it gets approved by Ms. Barbara O'Neil.
3. GRS 6.1: EMAIL MANAGED UNDER A CAPSTONE APPROACH schedule is being finalized.
4. Working on new Agency E-Mail policy to address management of temporary and permanent email using the capstone approach to email management.

### **Records Management**

1. NARA Records Management Self-Assessment and Agency Email Management Report are due 17 March 2017. Currently both have been reviewed by OCIOA Infrastructure and OCIOA Information Assurance. Both reports will be submitted 8 March 2017 via NARA's online website.
2. Conducted Final Review of NxGen Schedule with NLRB's NARA's assigned Archivist, OCIOA Information Assurance, Records Officer, Records Officer Specialist and Ms. Kilpatrick. Archivist has some technical questions that he has to get response's too, however, at this point he anticipates that NLRB will receive an approve schedule by July 2017. Additionally, the Archivist is checking into how we proper disposition all Hard Drives that are being in saved In the OCIOA Information Assurance safe. Anticipate guidance this week.

Respectfully, Ken Williams  
Records Officer

National Labor Relations Board  
1015 Half Street RM#3071  
1-202-273-2833

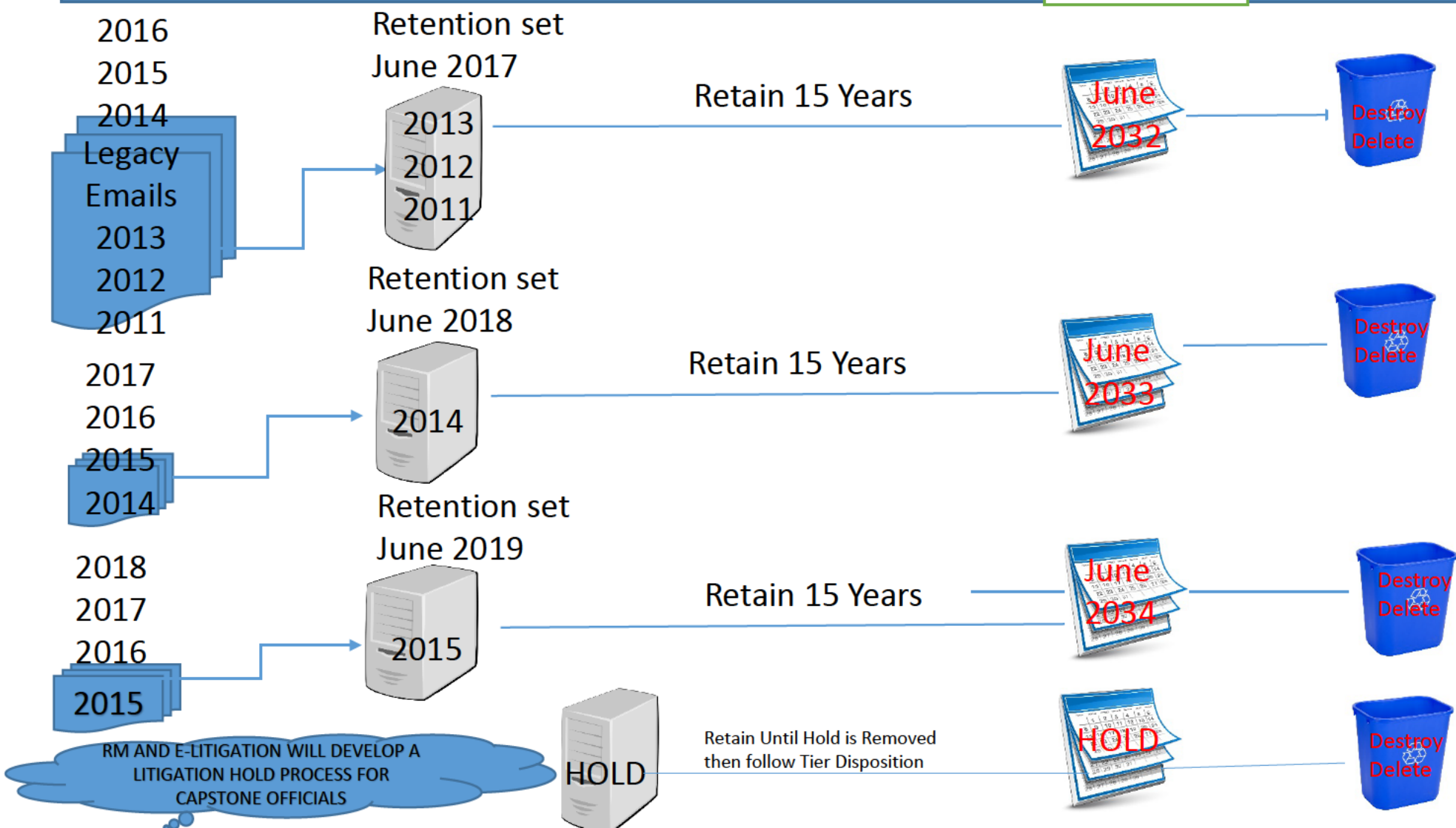
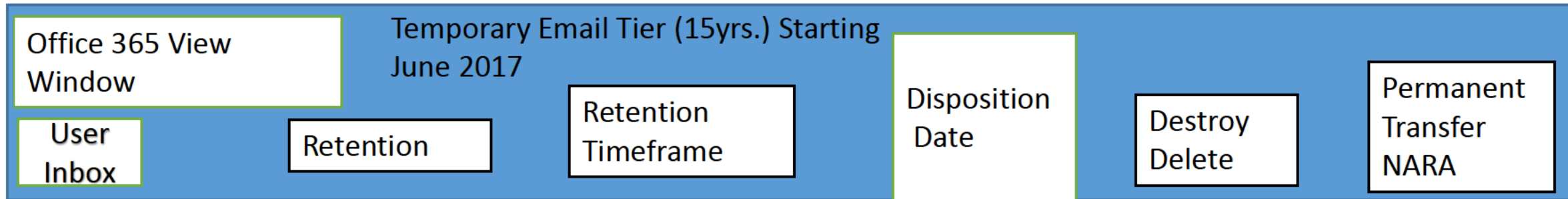
**From:** [Williams, Kenneth J.](#)  
**To:** [Marks, Eric](#)  
**Cc:** [Warren, Tremell](#); [Sanders, Laurie](#)  
**Subject:** Temporary Email Tier proposed change and NARA Capstone Schedule  
**Date:** Wednesday, March 8, 2017 9:30:00 AM  
**Attachments:** [Temporary Email Tier \(15yrs.\) \(Capstone\).pptx](#)  
[General Schedule for Capstone 6.1.pdf](#)  
[Capstone Officials Permanent Email Tier 1 \(15yrs.\).pptx](#)

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Mr. Marks,

If there is some consideration to extend the retention of temporary emails beyond 7 years based on Ms. O'Neill's recent email correspondence, please see the attached Temporary email Tier which depicts the legacy emails (years), the retention/time frame and the final disposition. In addition, I have also included the NARA General Record Schedule that authorizes longer retention based on the Agencies business needs. The last attachment describes the flow of the Capstone Officials Permanent Email. Standing by for any questions or concerns.

Respectfully, Ken Williams  
Records Officer  
National Labor Relations Board  
1015 Half Street RM#3071  
1-202-273-2833



## GENERAL RECORDS SCHEDULE 6.1: Email Managed under a Capstone Approach

This schedule applies *only* to Federal agencies that implement a Capstone approach as described in this GRS. When implementing this GRS, agencies should consult the FAQs about GRS 6.1, Email Managed under a Capstone Approach. Agencies are reminded that this GRS should not be implemented in isolation, and should be supplemented with agency-wide policies and training, as well as incorporated into agency records management implementation tools, such as manuals and file plans. Agencies adopting a Capstone approach should also consult other resources available from NARA related to email management, specifically the Capstone approach. These resources are available on NARA's [email management page](#) and are summarized in the introduction to the FAQ.

Agencies must not implement this GRS until approval of [NARA form 1005 \(NA-1005\), Verification for Implementing GRS 6.1](#). Additional information, including a link to the form, may be found in FAQ 3 and in the instructions accompanying the form.

### GRS Scope

Email can be managed at an account level, at a mailbox level, in personal folder files, or other ways. This GRS applies to all email, regardless of how the email messages are managed or what email technology is used. Email, in the context of this GRS, also includes any associated attachments. This GRS may apply to records affiliated with other commonly available functions of email programs such as calendars/appointments, tasks, and chat.

Each agency is responsible for determining the scope of implementation when using Capstone, including, 1) The range of implementation in an organization (agency-wide, specific office, etc.); and 2) The range of implementation regarding email technology and system platforms. Brief information on the scope of an agency's Capstone implementation is also required on NA-1005.

Agencies are also responsible for defining (and documenting through policy) the official recordkeeping version of email to be managed under a Capstone approach, especially when email is captured or retained in multiple locations (e.g., an email archive vs. the live system). All other versions of email can be considered nonrecord, the retention of which should be addressed in agency email policy.

Agencies are expected to apply documented selection criteria to cull the email of Capstone officials (permanent accounts) to the greatest extent possible before transfer to NARA. Culling refers to the removal – or otherwise excluding from capture – of nonrecord, personal, or transitory messages and attachments. Culling typically includes the removal of spam, email blasts received (such as agency-wide communications), and personal materials (such as emails to family members not related to agency business). Culling may be manual, automated, or a hybrid of both. Agencies may develop their own policies and procedures for the culling of temporary accounts.

### Applying this GRS

When applying this GRS in part, agencies must ensure that all other email records are covered by another NARA-approved disposition authority. Agencies NOT managing any of their email under the Capstone approach are still responsible for managing their email by applying NARA-approved records schedules.

If an agency is implementing a Capstone disposition approach different from what is provided in this GRS, the agency must submit a records schedule. For example, an agency may want to narrow the list of required positions in item 010, use shorter retention lengths for temporary records, or extend the time frame for transfer of permanent records.

Agencies have discretion to designate individual email messages, with their attachments as permanent, or as longer-term temporary records that should be crossfiled elsewhere pursuant to agency policies and business needs.

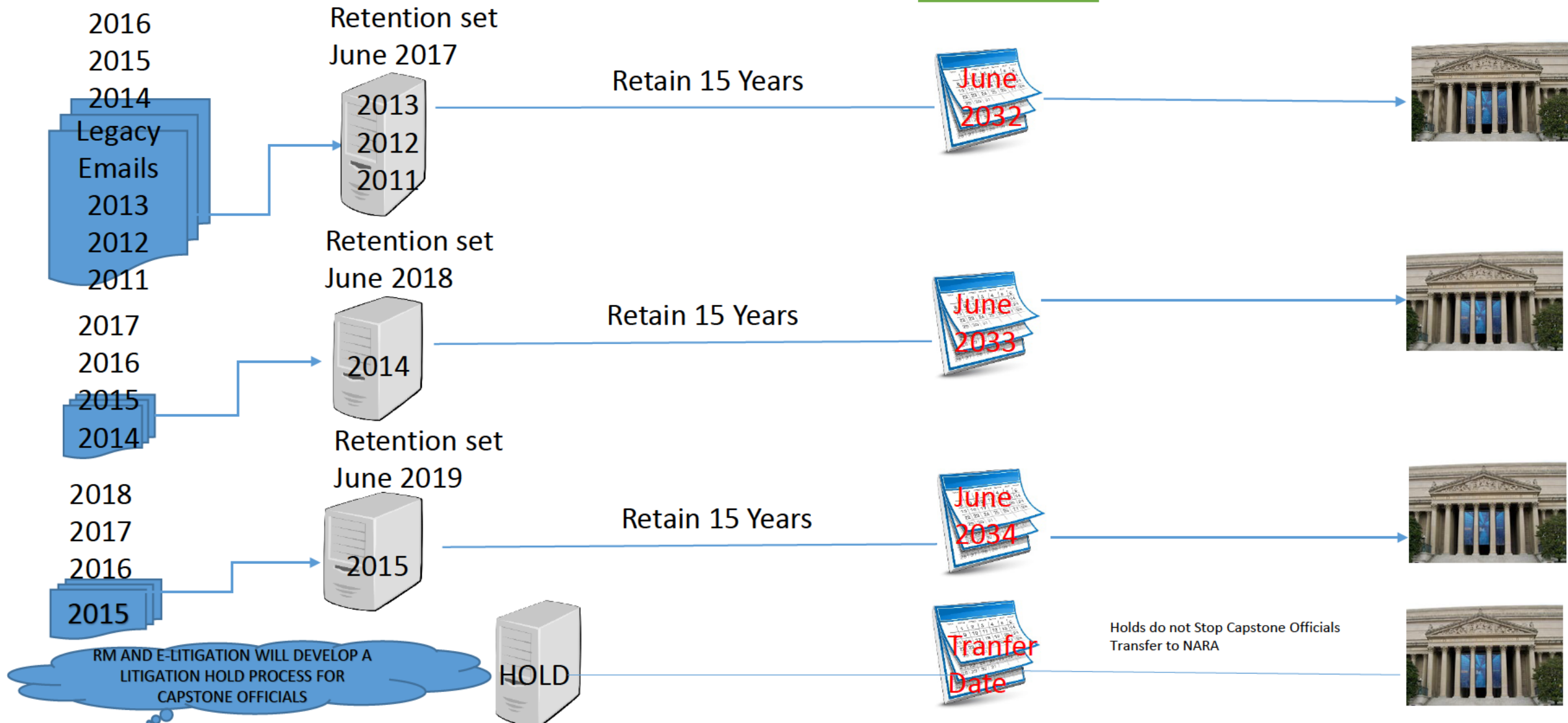
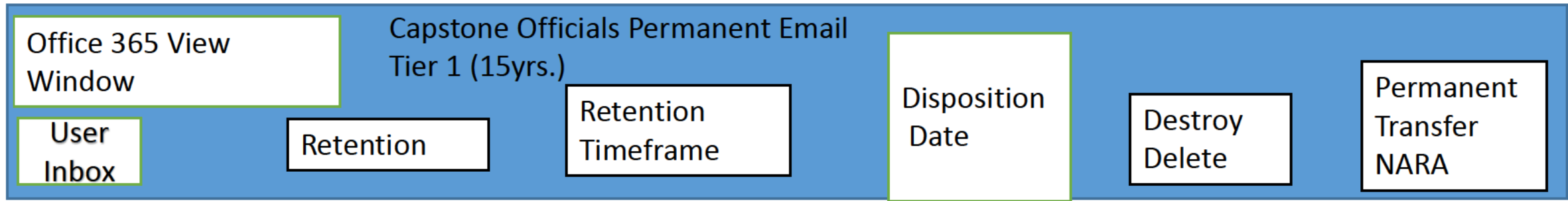
Agencies must transfer to NARA the emails of Capstone officials captured during their tenure as a Capstone official. Therefore, email of Capstone officials created prior to their designation as a Capstone official (e.g., prior to their promotion/rotation into a Capstone position) should be treated as temporary and not transferred to NARA. For guidance on transferring email as a permanent record, see NARA Bulletin 2014-04, Revised Format Guidance for the Transfer of Permanent Electronic Records and the relevant sections of [36 CFR Part 1235](#).

Item	Records Description	Disposition Instruction	Disposition Authority
010	<p><b>Email of Capstone officials.</b></p> <p>Capstone Officials are senior officials designated by account level or by email addresses, whether the addresses are based on an individual's name, title, a group, or a specific program function. Capstone officials include all those listed on an approved NARA form 1005 (NA-1005), <i>Verification for Implementing GRS 6.1</i>, and must include, when applicable:</p> <ol style="list-style-type: none"> <li>1. The head of the agency, such as Secretary, Commissioner, Administrator, Chairman or equivalent;</li> <li>2. Principal assistants to the head of the agency (second tier of management), such as Under Secretaries, Assistant Secretaries, Assistant Commissioners, and/or their equivalents; this includes officers of the Armed Forces serving in comparable position(s);</li> <li>3. Deputies of all positions in categories 1 and 2, and/or their equivalent(s);</li> <li>4. Staff assistants to those in categories 1 and 2, such as special assistants, confidential assistants, military assistants, and/or aides;</li> <li>5. Principal management positions, such as Chief Operating Officer, Chief Information Officer, Chief Knowledge Officer, Chief Technology Officer, and Chief Financial Officer, and/or their equivalent(s);</li> <li>6. Directors of significant program offices, and/or their equivalent(s);</li> <li>7. Principal regional officials, such as Regional Administrators, and/or their equivalent(s);</li> <li>8. Roles or positions that routinely provide advice and oversight to the agency, including those positions in categories 1 through 3 and 5 through 7, including: General Counsels, Chiefs of Staff, Inspectors General,</li> </ol>	<p><b>Permanent.</b> Cut off in accordance with agency's business needs. Transfer to NARA 15-25 years after cutoff, or after declassification review (when applicable), whichever is later.</p>	<p>DAA-GRS-2014-0001-0001</p>



	<p>etc.;</p> <p>9. Roles and positions not represented above and filled by Presidential Appointment with Senate Confirmation (PAS positions); and</p> <p>10. Additional roles and positions that predominately create permanent records related to mission critical functions or policy decisions and/or are of historical significance.</p> <p>This includes those officials in an acting capacity for any of the above positions longer than 60 days. Agencies may also include individual emails from otherwise temporary accounts appropriate for permanent disposition in this category.</p> <p>This item <i>must</i> include all existing legacy email accounts that correlate to the roles and positions described above.</p> <p>If a Capstone official has more than one agency-administered email account, this item applies to all accounts. If a Capstone official has an email account managed by other staff (such as personal assistants, confidential assistants, military assistants, or administrative assistants), this item applies to those accounts. This item applies to all email regardless of the address names used by the Capstone official for agency business, such as nicknames or office title names. Email from personal or non-official email accounts in which official agency business is conducted is also included. A complete copy of these records must be forwarded to an official electronic messaging account of the officer or employee not later than 20 days after the original creation or transmission of the record.</p> <p>Please consult NA-1005, for more information on which positions are included within each category.</p> <p>Not media neutral; applies to records managed in an electronic format only.</p> <p><b>Note 1:</b> Cabinet level agencies implementing a Capstone approach that includes their components/operatives must apply the above definition to each component individually. In these cases, each component/operative is considered a separate agency in terms of the above definition of Capstone Officials. A component/operative of a cabinet level agency can implement a Capstone approach independent of their department but must also conform to the entirety of this definition.</p> <p><b>Note 2:</b> Smaller agencies, micro-agencies or Commissions implementing a Capstone approach may find that some of their Capstone positions fall into several of the categories above and/or that they do not have applicable roles or positions for all categories.</p>		
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011	<p><b>Email of Non-Capstone officials.</b> Email of all other officials, staff, and contractors not included in item 010.</p> <p>Not media neutral; applies to records managed in an electronic format only.</p> <p><b>Note:</b> Agencies <i>only</i> using item 011 and/or item 012 of this GRS may not dispose of any email of officials in item 010, Email of Capstone Officials, of this GRS without authority from NARA in the form of another GRS or agency-specific schedule. Submission and approval of NA-1005 is still required in these instances to document those being exempted from Capstone.</p>	<p><b>All others except those in item 012.</b> Includes positions and email not covered by items 010 or 012 of this schedule.</p> <p>This item applies to the majority of email accounts/users within an agency adopting a Capstone approach.</p>	<p><b>Temporary.</b> Delete when 7 years old, but longer retention is authorized if required for business use.</p>	DAA-GRS-2014-0001-0002
012		<p><b>Support and/or administrative positions.</b> Includes non-supervisory positions carrying out routine and/or administrative duties. These duties comprise general office or program support activities and frequently facilitate the work of Federal agencies and their programs. This includes, but is not limited to, roles and positions that: process routine transactions; provide customer service; involve mechanical crafts, or unskilled, semi-skilled, or skilled manual labor; respond to general requests for information; involve routine clerical work; and/or primarily receive nonrecord and/or duplicative email.</p>	<p><b>Temporary.</b> Delete when 3 years old, but longer retention is authorized if required for business use.</p>	DAA-GRS-2014-0001-0003



**From:** [Williams, Kenneth J.](#)  
**To:** [Warren, Tremell](#)  
**Subject:** FW: Draft Capstone Memo to all Employees  
**Date:** Monday, March 20, 2017 9:52:00 AM  
**Attachments:** [Capstone memo to Agency employees \(Draft 3-20-17\).docx](#)

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For your review. I have reviewed it and see no issues or concerns with this notification.

R/Ken

---

**From:** O'Neill, Barbara A.  
**Sent:** Monday, March 20, 2017 9:44 AM  
**To:** Aburvasamy, Prem <Prem.Aburvasamy@nlrb.gov>; Williams, Kenneth J. <Kenneth.Williams@nlrb.gov>  
**Cc:** Platt, Nancy <Nancy.Platt@nlrb.gov>; Gaston, David <David.Gaston@nlrb.gov>; Cullen, Christopher P. <Christopher.Cullen@nlrb.gov>  
**Subject:** Draft Capstone Memo to all Employees

Prem and Ken, attached is a draft memo that we have prepared to send to all employees about Capstone and the soon-to-be implemented email retention policy. We are thinking that this will be the first of several. I am checking with Elizabeth Kilpatrick to make sure we are referring to the correct OM memos on the last page concerning the NxGen retention policy. And, once you are okay with this, I will probably run it by Jennifer Abruzzo and Bob Schiff just as an FYI before it goes out.

Please circulate it to whomever in your office you feel should take a pass on it. And feel free to call or set up a meeting if you think we should discuss.

**From:** [Weth, Patricia](#)  
**To:** [Williams, Kenneth J.](#)  
**Subject:** E- mail Retention Plan  
**Date:** Tuesday, March 21, 2017 9:57:11 AM

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Good Morning Ken,

I requested a copy of the email retention plan from OCIO. They suggested that I contact your for it.

At your convenience, please provide me with a copy of the NLRB retention plan or direct me as to where it is located on Sharepoint.

Thanking you in advance for your assistance in this matter.

Kind regards,  
Patricia

Patricia A. Weth  
Deputy Assistant General Counsel  
National Labor Relations Board (NLRB)  
Division of Legal Counsel, FOIA Branch  
TEL (202) 273-2929  
Email: [Patricia.Weth@nrlb.gov](mailto:Patricia.Weth@nrlb.gov)

---

**From:** Williams, Kenneth J.  
**Sent:** Tuesday, March 21, 2017 8:18 AM  
**To:** Weth, Patricia <[Patricia.Weth@nrlb.gov](mailto:Patricia.Weth@nrlb.gov)>; Newman, Bonita G. <[Bonita.Newman@nrlb.gov](mailto:Bonita.Newman@nrlb.gov)>; Maybin, Eugenia <[Eugenia.Maybin@nrlb.gov](mailto:Eugenia.Maybin@nrlb.gov)>  
**Cc:** Keeling, Synta <[Synta.Keeling@nrlb.gov](mailto:Synta.Keeling@nrlb.gov)>  
**Subject:** RE: E-Discovery, Records & Information Management Conference Newsletter

Thank you so much Ms. Weth.

Respectfully, Ken Williams  
Records Officer  
National Labor Relations Board  
1015 Half Street RM#3071  
1-202-273-2833

---

**From:** Weth, Patricia  
**Sent:** Monday, March 20, 2017 1:48 PM  
**To:** Williams, Kenneth J. <[Kenneth.Williams@nrlb.gov](mailto:Kenneth.Williams@nrlb.gov)>; Newman, Bonita G. <[Bonita.Newman@nrlb.gov](mailto:Bonita.Newman@nrlb.gov)>; Maybin, Eugenia <[Eugenia.Maybin@nrlb.gov](mailto:Eugenia.Maybin@nrlb.gov)>

**Cc:** Keeling, Synta <[Synta.Keeling@nlrb.gov](mailto:Synta.Keeling@nlrb.gov)>

**Subject:** RE: E-Discovery, Records & Information Management Conference Newsletter

Ken,

I do not envy your task. I hope it goes smoothly.

From time to time, I will loop you all in on interesting training programs for your information.

Best,  
Patricia

Patricia A. Weth  
Deputy Assistant General Counsel  
National Labor Relations Board (NLRB)  
Division of Legal Counsel, FOIA Branch  
TEL (202) 273-2929  
Email: [Patricia.Weth@nlrb.gov](mailto:Patricia.Weth@nlrb.gov)

---

**From:** Williams, Kenneth J.

**Sent:** Monday, March 20, 2017 1:35 PM

**To:** Weth, Patricia <[Patricia.Weth@nlrb.gov](mailto:Patricia.Weth@nlrb.gov)>; Newman, Bonita G. <[Bonita.Newman@nlrb.gov](mailto:Bonita.Newman@nlrb.gov)>;  
Maybin, Eugenia <[Eugenia.Maybin@nlrb.gov](mailto:Eugenia.Maybin@nlrb.gov)>

**Cc:** Keeling, Synta <[Synta.Keeling@nlrb.gov](mailto:Synta.Keeling@nlrb.gov)>

**Subject:** RE: E-Discovery, Records & Information Management Conference Newsletter

Ms. Weth,

We would love to attend, however, unfortunately we are schedule to go to the warehouse on Wednesday. We have a fast approaching deadline of 1 May 2017 to remove all agency temporary and permanent records from the Warehouse. Our support and admiration goes with Synta.

Respectfully,  
Ken Williams, Records Officer  
National Labor Relations Board  
1015 Half Street RM#3071  
1-202-273-2833

---

**From:** Weth, Patricia

**Sent:** Monday, March 20, 2017 1:06 PM

**To:** Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>; Newman, Bonita G. <[Bonita.Newman@nlrb.gov](mailto:Bonita.Newman@nlrb.gov)>; Maybin, Eugenia <[Eugenia.Maybin@nlrb.gov](mailto:Eugenia.Maybin@nlrb.gov)>

**Cc:** Keeling, Synta <[Synta.Keeling@nlrb.gov](mailto:Synta.Keeling@nlrb.gov)>

**Subject:** FW: E-Discovery, Records & Information Management Conference Newsletter

Good Morning All,

On Wednesday, Synta will be speaking the DGI event. It is a free conference!! You may be interested in attending.

**E-Discovery, Records & Information Management Conference & Expo**  
**Digital Government Institute, Washington, D.C.**

***Ronald Reagan Building, Washington, D.C.***

Government and industry experts will discuss current technology-based requirements and examples of successful electronic records management and e-discovery programs, explore agency case studies for meeting the OMB Managing Government Records Directive requirements, and workflow challenges and debate over changing preservation rules. The event, which is free for government professionals, will be held at the Ronald Reagan Building from 7:30 a.m. to 3 p.m. For more information and to register, go to the [Digital Government Institute website](#).

**Note:** Synta will be a panelist!!!

I hope to see you there!

Best,  
Patricia

---

**From:** Digital Government Institute [<mailto:kathy@digitalgovernment.ccsend.com>] **On Behalf Of**

Digital Government Institute

**Sent:** Thursday, March 16, 2017 2:40 PM

**To:** Weth, Patricia <[Patricia.Weth@nlrb.gov](mailto:Patricia.Weth@nlrb.gov)>

**Subject:** E-Discovery, Records & Information Management Conference Newsletter



# E-Discovery, Records & Information Management Conference 2017 Newsletter

March 22, 2017 | Ronald Reagan Building, Washington, DC

One week to go until the 14th annual E-Discovery, Records & Information Management Conference, hosted by Digital Government Institute. This year's theme, "Year of Transition," will cover topics like Directive 2.0, IT modernization, CUI, archive worthiness, and more! Check out the complete agenda below!

## Agenda



## EDRM 2015



E-Discovery, Records & Information  
Management Conference 2016

E-Discovery, Records & Information  
Management Expo 2016

[Click](#) for an album of last year's event! Are you in any of the photos?



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Taking Action Beyond Compliance](#)



[Modernizing Government Records](#)



[A Capstone Approach to US  
Government Records Management](#)



[Discovering Data in Today's  
Government](#)



[More at the DGI Technical Community Page](#)

---

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**Veritas** can help you manage your data at your agency AND your data at home. Stop by the their table at the conference on March 22 for a chance to win an **Amazon Echo Dot**.

**BONUS:** Look out for the "Records Management Playbook" - coming soon!

---

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**From:** [O'Neill, Barbara A.](#)  
**To:** [Aburvasamy, Prem](#); [Williams, Kenneth J.](#)  
**Subject:** FW: Capstone - agency email retention policy - Memo to Agency employees  
**Date:** Tuesday, March 28, 2017 10:45:50 AM  
**Attachments:** [Capstone memo to Agency employees \(Draft 3-28-17\).docx](#)  
[Capstone memo to Agency employees \(Draft 3-28-17\) chgs accepted.docx](#)

---

Prem and Ken, after your review of the memo I circulated it to Jennifer Abruzzo and Robert Schiff one last time, they made some subtle changes. Attached is the memo with their track suggestions and changes and also the final accepting all changes.

We are meeting with the PA today and, as long as Harry Jones agrees, we will plan to issue this tomorrow.

---

**From:** O'Neill, Barbara A.  
**Sent:** Tuesday, March 28, 2017 10:44 AM  
**To:** Abruzzo, Jennifer <Jennifer.Abruzzo@nlrb.gov>; Schiff, Robert <Robert.Schiff@nlrb.gov>  
**Cc:** Platt, Nancy <Nancy.Platt@nlrb.gov>; Gaston, David <David.Gaston@nlrb.gov>  
**Subject:** Capstone - agency email retention policy - Memo to Agency employees

Thanks for your helpful comments – we've incorporated them in the attached documents (the second one has changes accepted). (b) (5)

[REDACTED]

[REDACTED] We are meeting with the Union late today, and expect to email this to everyone tomorrow. E-Litigation folks are also working with OCIO on the details for storing the critical historical emails employees wish to preserve, and will distribute instructions on that shortly as well.

**From:** [Aburvasamy, Prem](#)  
**To:** [ML-NLRB-Everyone \(R\)](#)  
**Subject:** New Agency Email Retention Policies – “Capstone” Approach  
**Date:** Friday, March 31, 2017 9:51:00 AM  
**Attachments:** [Capstone memo to Agency employees \(3-31-17\).pdf](#)

---

All,

To comply with directives and guidance from the Office of Management and Budget (OMB) and the National Archives and Records Administration (NARA), the Agency must implement new email retention policies. The new policies are the result of a Presidential Memorandum (“Managing Government Records”) signed by the President on November 28, 2011, and a subsequent August 24, 2012 directive issued by OMB and NARA (M-12-18, “Managing Government Records Directive”), which requires Executive Branch Agencies to “manage both permanent and temporary email records in accessible electronic format.”

In order to comply with this directive, the Agency is implementing a “Capstone” approach for managing Agency email records, based on NARA guidance (NARA Bulletin 2013-02 “Guidance on a New Approach to Managing Email Records”). Implementation is scheduled to begin on June 1, 2017. Under the “Capstone” approach, the Agency will manage email records based on the role of the email account user and/or office rather than on the content of each email record.

Please see attached memo regarding the Agency Email Retention Policies.

Thank you.  
Prem

Prem Aburvasamy | Chief Information Officer  
National Labor Relations Board (NLRB)  
1015 Half Street SE | Washington, DC 20570  
[prem.aburvasamy@nrlrb.gov](mailto:prem.aburvasamy@nrlrb.gov) | 202-273-3925

UNITED STATES GOVERNMENT  
*National Labor Relations Board*



Memorandum

**Date:** March 31, 2017

**To:** All Employees

**From:** Prem Aburvasamy, Chief Information Officer  
Kenneth Williams, Records Officer  
David Gaston, Branch Chief, E-Litigation Branch

**Subject:** New Agency Email Retention Policies – “Capstone” Approach

---

To comply with directives and guidance from the Office of Management and Budget (OMB) and the National Archives and Records Administration (NARA), the Agency must implement new email retention policies. The new policies are the result of a Presidential Memorandum (“Managing Government Records”) signed by the President on November 28, 2011, and a subsequent August 24, 2012 directive issued by OMB and NARA (M-12-18, “Managing Government Records Directive”), which requires Executive Branch Agencies to “manage both permanent and temporary email records in accessible electronic format.”

To comply with this directive, the Agency is implementing a “Capstone” approach for managing Agency email records, based on NARA guidance (NARA Bulletin 2013-02 “Guidance on a New Approach to Managing Email Records”). Implementation is scheduled to begin on June 1, 2017. Under the “Capstone” approach, the Agency will manage email records based on the role of the email account user and/or office rather than on the content of each email record.

Email records will be captured and managed according to user role using the following retention approach:

- a. **Email Records from Email Accounts of Designated “Capstone” Officials:** The email records from the email accounts of certain “policy makers” whose role within the Agency predominantly creates permanent records will be retained permanently. These “Capstone” Officials include the Chairman and Board members; Chief of Staff to the Chairman; the Solicitor; the Executive Secretary; Chief Counsels to Board Members; the Chief Information Officer; the General Counsel; the Deputy General Counsel; the Executive Assistant to the General Counsel; the Associate

General Counsels of Operations-Management, Advice, Enforcement-Litigation, and Legal Counsel; Associate to the General Counsel of Operations-Management; the Chief Financial Officer; and the Director of Administration.

b. **Email Records from Email Accounts of Users Not Designated as Capstone Officials:** For all other Agency email account users, identified as “non-Capstone” custodians, the “Capstone” approach will retain **all** emails for seven years. **Email records older than seven years will be deleted beginning June 1, 2017.** Email records will be deleted perpetually and on a daily basis as the seven-year mark is reached.

To the extent that users have particular emails they wish to retain as historical records, instructions from management will be distributed shortly regarding the criteria for determining which emails may be retained, as well as where those emails may be retained outside of the Agency’s email system. Other than these limited email records, “non-Capstone” custodians are instructed to not remove Agency email records from the Agency’s email system prior to policy implementation. For example, saving Agency email records beyond those which meet the criteria for longer retention to an external location negates and circumvents the effect of the new email retention policies. Non-compliance with the “Capstone” policy will require expanded searches by the Agency to fully respond to FOIA requests, Congressional inquiries, and matters in litigation, creating additional costs and legal risk. Non-compliance also exposes the Agency to legal liability and possible sanctions for failing to comply with the Agency’s published email retention standards.

These changes do not modify any obligations to upload emails to NxGen pursuant to Agency policies on that system (*see* OM 12-80 (revised), OM 13-23). The new email retention policies also do not modify records stored in NxGen, litigation holds, or any other obligations of an Agency employee to preserve emails for pending or anticipated litigation.

**From:** [O'Neill, Barbara A.](#)  
**To:** [Aburvasamy, Prem](#)  
**Cc:** [Gaston, David](#); [Williams, Kenneth J.](#); [Platt, Nancy](#)  
**Subject:** RE: New Agency Email Retention Policies – “Capstone” Approach  
**Date:** Friday, March 31, 2017 12:39:41 PM

---

Prem, I'd like to see who else we hear from now that this memo has gone out. I have tried to preempt this by discussing this with management in advance of issuance of this memorandum, but I did not discuss with the ALJS, so let's see. Also, Nancy & I are going to discuss with Jennifer A. because the identification of who was a Capstone custodian happened long before Nancy & I were promoted into these positions and we would like to get some background. Were you involved in the initial discussions about who was to be a Capstone custodian?

---

**From:** Aburvasamy, Prem  
**Sent:** Friday, March 31, 2017 12:16 PM  
**To:** O'Neill, Barbara A. <[Barbara.O'Neill@nlrb.gov](mailto:Barbara.O'Neill@nlrb.gov)>  
**Cc:** Gaston, David <[David.Gaston@nlrb.gov](mailto:David.Gaston@nlrb.gov)>; Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>; Platt, Nancy <[Nancy.Platt@nlrb.gov](mailto:Nancy.Platt@nlrb.gov)>  
**Subject:** FW: New Agency Email Retention Policies – “Capstone” Approach

Barbara,

Please see email from the Judges division. We can discuss.

Thanks.  
Prem

---

**From:** Giannasi, Robert (ALJ)  
**Sent:** Friday, March 31, 2017 11:22 AM  
**To:** Aburvasamy, Prem <[Prem.Aburvasamy@nlrb.gov](mailto:Prem.Aburvasamy@nlrb.gov)>  
**Cc:** Etchingham, Gerald M. <[Gerald.Etchingham@nlrb.gov](mailto:Gerald.Etchingham@nlrb.gov)>; Amchan, Arthur <[Arthur.Amchan@nlrb.gov](mailto:Arthur.Amchan@nlrb.gov)>; Landow, Mindy <[Mindy.Landow@nlrb.gov](mailto:Mindy.Landow@nlrb.gov)>  
**Subject:** RE: New Agency Email Retention Policies – “Capstone” Approach

Prem—what say you?

---

**From:** Etchingham, Gerald M.  
**Sent:** Friday, March 31, 2017 11:19 AM  
**To:** Giannasi, Robert (ALJ) <[Robert.Giannasi@nlrb.gov](mailto:Robert.Giannasi@nlrb.gov)>; Amchan, Arthur <[Arthur.Amchan@nlrb.gov](mailto:Arthur.Amchan@nlrb.gov)>; Landow, Mindy <[Mindy.Landow@nlrb.gov](mailto:Mindy.Landow@nlrb.gov)>  
**Cc:** Etchingham, Gerald M. <[Gerald.Etchingham@nlrb.gov](mailto:Gerald.Etchingham@nlrb.gov)>  
**Subject:** FW: New Agency Email Retention Policies – “Capstone” Approach

This new policy on retaining emails permanently versus only 7 years does not list the Chief Judge or Associate Chief Judges as Capstone Officials in the “a.”

category below as similar chiefs and associate chiefs of other departments in our agency.

Is this correct or just an oversight that needs correcting? I have gotten used to having emails I can go back to when previously we had to worry about the number of emails we had and occasionally deleted them so we wouldn't go over our maximum capacity.

Jerry

Email records will be captured and managed according to user role using the following retention approach:

a. Email Records from Email Accounts of Designated "Capstone" Officials: The email records from the email accounts of certain "policy makers" whose role within the Agency predominantly creates permanent records will be retained permanently. These "Capstone" Officials include the Chairman and Board members; Chief of Staff to the Chairman; the Solicitor; the Executive Secretary; Chief Counsels to Board Members; the Chief Information Officer; the General Counsel; the Deputy General Counsel; the Executive Assistant to the General Counsel; the Associate General Counsels of Operations-Management, Advice, Enforcement-Litigation, and Legal Counsel; Associate to the General Counsel of Operations-Management; the Chief Financial Officer; and the Director of Administration.

b. Email Records from Email Accounts of Users Not Designated as Capstone Officials: For all other Agency email account users, identified as "non-Capstone" custodians, the "Capstone" approach will retain all emails for seven years. Email records older than seven years will be deleted beginning June 1, 2017. Email records will be deleted perpetually and on a daily basis as the seven-year mark is reached.

---

**From:** Aburvasamy, Prem

**Sent:** Friday, March 31, 2017 6:51 AM

**To:** ML-NLRB-Everyone (R) <[ML-NLRB-Everyone@nlrb.gov](mailto:ML-NLRB-Everyone@nlrb.gov)>

**Subject:** New Agency Email Retention Policies – "Capstone" Approach



All,

To comply with directives and guidance from the Office of Management and Budget (OMB) and the National Archives and Records Administration (NARA), the Agency must implement new email retention policies. The new policies are the result of a Presidential Memorandum (“Managing Government Records”) signed by the President on November 28, 2011, and a subsequent August 24, 2012 directive issued by OMB and NARA (M-12-18, “Managing Government Records Directive”), which requires Executive Branch Agencies to “manage both permanent and temporary email records in accessible electronic format.”

In order to comply with this directive, the Agency is implementing a “Capstone” approach for managing Agency email records, based on NARA guidance (NARA Bulletin 2013-02 “Guidance on a New Approach to Managing Email Records”). Implementation is scheduled to begin on June 1, 2017. Under the “Capstone” approach, the Agency will manage email records based on the role of the email account user and/or office rather than on the content of each email record.

Please see attached memo regarding the Agency Email Retention Policies.

Thank you.  
Prem

Prem Aburvasamy | Chief Information Officer  
National Labor Relations Board (NLRB)  
1015 Half Street SE | Washington, DC 20570  
[prem.aburvasamy@nrlb.gov](mailto:prem.aburvasamy@nrlb.gov) | 202-273-3925

**From:** [Aburvasamy, Prem](#)  
**To:** [Chahrouri, Katherine](#)  
**Cc:** [Williams, Kenneth J.](#)  
**Subject:** RE: New Agency Email Retention Policies – “Capstone” Approach (What about FAXES?)  
**Date:** Monday, April 3, 2017 9:29:47 AM

---

Good Morning Katherine,

All case related faxes should be saved to the associated case files in NxGen. NLRB Records Standard #802-03, which requires charges to be placed in the case file when a complaint is issued or case is closed. This action will resolve the issue of assuring that the date the charges were submitted are retained and mitigate the risk of information getting lost and lack of proof of the date received.

Also, faxes though received via email, they are stored in public folder and will not be managed as an email record.

Thank you.  
Prem

---

**From:** Chahrouri, Katherine  
**Sent:** Friday, March 31, 2017 10:10 AM  
**To:** Aburvasamy, Prem <Prem.Aburvasamy@nlrb.gov>  
**Subject:** RE: New Agency Email Retention Policies – “Capstone” Approach (What about FAXES?)

Greetings,

Now that we have incoming faxes converted to emails and delivered to a central email inbox for each fax number, what are the requirements for retaining records of incoming faxes? Some offices previously kept the logs which the fax machines would print out, but from my experience, the practice with regard to retention of fax records has differed greatly from region to region.

What are the requirements now? Some offices just delete everything that comes to the fax inbox as soon as it the items have been forwarded to the review chain ending with the recipient named on the fax cover sheet.

(b) (5)

[REDACTED]

I’m not aware of any guidance ever being issued in relation to record retention of fax receipt documents/receipt logs, particularly since we moved to the new fax system along with the new Skype phone system.

Can you point me to any guidance on this issue?

Thanks,  
Kathy

---

Katherine Chahrouri, Supervisory Attorney  
National Labor Relations Board – Region 10  
233 Peachtree St. NE, Suite 1000 Harris Tower  
Atlanta, GA 30303  
Phone (470) 343-7505  
Cell (202) 702-0920  
Fax (404) 331-2858

To sign up for the Region 10 Perspective newsletter, [click here](#).

The NLRB encourages you to use our e-filing system to file documents!

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E-File new Charge/Petition: <https://apps.nlr.gov/eservice/efileterm.aspx?app=chargeandpetition>

You may submit FOIA requests online this link at <http://www.nlr.gov/news-outreach/foia/e-foia-request-form>.

---

**From:** Aburvasamy, Prem  
**Sent:** Friday, March 31, 2017 8:51 AM  
**To:** ML-NLRB-Everyone (R) <[ML-NLRB-Everyone@nlrb.gov](mailto:ML-NLRB-Everyone@nlrb.gov)>  
**Subject:** New Agency Email Retention Policies – “Capstone” Approach

All,

To comply with directives and guidance from the Office of Management and Budget (OMB) and the National Archives and Records Administration (NARA), the Agency must implement new email retention policies. The new policies are the result of a Presidential Memorandum (“Managing Government Records”) signed by the President on November 28, 2011, and a subsequent August 24, 2012 directive issued by OMB and NARA (M-12-18, “Managing Government Records Directive”), which requires Executive Branch Agencies to “manage both permanent and temporary email records in accessible electronic format.”

In order to comply with this directive, the Agency is implementing a “Capstone” approach for managing Agency email records, based on NARA guidance (NARA Bulletin 2013-02 “Guidance on a New Approach to Managing Email Records”). Implementation is scheduled to begin on June 1, 2017. Under the “Capstone” approach, the Agency will manage email records based on the role of the email account user and/or office rather than on the content of each email record.

Please see attached memo regarding the Agency Email Retention Policies.

Thank you.  
Prem

Prem Aburvasamy | Chief Information Officer  
National Labor Relations Board (NLRB)  
1015 Half Street SE | Washington, DC 20570  
[prem.aburvasamy@nrlb.gov](mailto:prem.aburvasamy@nrlb.gov) | 202-273-3925

**From:** [O'Neill, Barbara A.](#)  
**To:** [Aburvasamy, Prem](#); [Platt, Nancy](#); [Gaston, David](#)  
**Cc:** [Marks, Eric](#); [Williams, Kenneth J.](#); [Pojeta, Thomas J.](#)  
**Subject:** RE: Capstone FAQ  
**Date:** Thursday, April 27, 2017 4:07:38 PM  
**Attachments:** [Capstone memo to additional Capstone custodians \(Final 4-5-17\).pdf](#)  
[Capstone FAQ 4-27 \(bon edits\).docx](#)

---

Prem, if you recall we added additional Capstone custodians by Memo dated April 5 (it is attached), so the answer to 3a needs to be revised. I have added them (see attached revised FAQ). Also, you had added the IG as a Capstone official, but I do not see him listed in any of the memos on this as a capstone custodian?

---

**From:** Aburvasamy, Prem  
**Sent:** Thursday, April 27, 2017 3:23 PM  
**To:** O'Neill, Barbara A. <Barbara.O'Neill@nrlb.gov>; Platt, Nancy <Nancy.Platt@nrlb.gov>; Gaston, David <David.Gaston@nrlb.gov>  
**Cc:** Marks, Eric <Eric.marks@nrlb.gov>; Williams, Kenneth J. <Kenneth.Williams@nrlb.gov>; Pojeta, Thomas J. <Thomas.Pojeta@nrlb.gov>  
**Subject:** Capstone FAQ

All,

Attached is the Capstone FAQ. Please review and provide me your comments.

Thanks.  
Prem

Prem Aburvasamy | Chief Information Officer  
National Labor Relations Board (NLRB)  
1015 Half Street SE | Washington, DC 20570  
[prem.aburvasamy@nrlb.gov](mailto:prem.aburvasamy@nrlb.gov) | 202-273-3925

UNITED STATES GOVERNMENT  
*National Labor Relations Board*



Memorandum

**Date:** April 5, 2017

**To:** Robert Giannasi, Chief Administrative Law Judge  
Arthur Amchan, Deputy Chief Administrative Law Judge  
Linda Dreeben, Deputy Associate General Counsel, Division of  
Enforcement Litigation  
Lori Ketcham, Designated Agency Ethics Official

**From:** Prem Aburvasamy, Chief Information Officer  
Kenneth Williams, Records Officer  
David Gaston, Branch Chief, E-Litigation Branch

**Subject:** Additional "Capstone" Custodians for Email Retention

---

On March 31, 2017, we issued a memorandum to all Agency employees informing them of a new "Capstone" email retention policy that is being implemented to comply with directives and guidance from OMB and NARA, pursuant to a Presidential Memorandum requiring Executive Branch Agencies to "manage both permanent and temporary email records in accessible electronic format." Pursuant to this policy, the email records of certain "policy makers" in the Agency, designated "Capstone custodians," will be permanently retained.

Upon further reflection, we have determined that several additional positions within the Agency should be designated as Capstone custodians. These include the positions that each of you currently hold: Chief Administrative Law Judge, Deputy Chief Administrative Law Judge, Deputy Associate General Counsel for the Division of Enforcement, and the Designated Agency Ethics Official. In addition, the Director of the Office of Representation Appeals, as well as the Director of the Office of Congressional and Public Affairs are also being designated as Capstone custodians, although these two positions are currently vacant.

If you have any questions, please feel free to contact us.

cc: Richard F. Griffin, Jr., General Counsel  
Jennifer Abruzzo, Deputy General Counsel  
Philip A. Miscimarra, Acting Chairman  
Robert Schiff, Chief of Staff to the Chairman  
John Ferguson, Associate General Counsel, Division of Enforcement

**From:** [O'Neill, Barbara A.](#)  
**To:** [Pojeta, Thomas J.](#); [Aburvasamy, Prem](#); [Marks, Eric](#); [Williams, Kenneth J.](#)  
**Cc:** [Platt, Nancy](#); [Gaston, David](#); [Cullen, Christopher P.](#); [Powell, Joel O.](#)  
**Subject:** RE: Sharepoint Instructions  
**Date:** Friday, April 28, 2017 11:40:22 AM  
**Attachments:** [Capstone Sharepoint Instructions 4-28-17 \(bon\).docx](#)

---

It looks great! I would just like to update # 3 of the FAQ to accurately reflect who we identify as Capstone officials as of today (see footnote 1 in attached draft instructions):

Capstone custodians include the Chairman and Board members; Chief of Staff to the Chairman; the Solicitor; the Executive Secretary; Chief Counsels to Board Members; Chief Administrative Law Judge; Deputy Chief Administrative Law Judge; Director of the Office of Representation Appeals; Director of the Office of Congressional and Public Affairs; the Chief Information Officer; the General Counsel; the Deputy General Counsel; the Executive Assistant to the General Counsel; the Associate General Counsels of Operations-Management, Advice, Enforcement-Litigation, and Legal Counsel; Deputy Associate General Counsel of Enforcement-Litigation; Associate to the General Counsel of Operations-Management; the Chief Financial Officer; Director of Administration; the Designated Agency Ethics Official and the Inspector General.

---

**From:** Pojeta, Thomas J.  
**Sent:** Friday, April 28, 2017 9:43 AM  
**To:** O'Neill, Barbara A. <Barbara.O'Neill@nrlb.gov>; Aburvasamy, Prem <Prem.Aburvasamy@nrlb.gov>; Marks, Eric <Eric.marks@nrlb.gov>; Williams, Kenneth J. <Kenneth.Williams@nrlb.gov>  
**Cc:** Platt, Nancy <Nancy.Platt@nrlb.gov>; Gaston, David <David.Gaston@nrlb.gov>; Cullen, Christopher P. <Christopher.Cullen@nrlb.gov>; Powell, Joel O. <Joel.Powell@nrlb.gov>  
**Subject:** RE: Sharepoint Instructions

Following is a draft Capstone page created in the Records Management site. Please provide your comments/feedback.

<https://nrlb.sharepoint.com/IT/RecordsManagement/SitePages/Email%20Retention%20Policies%20-%20Capstone%20Approach.aspx>

Thanks,

Tom

=====  
Thomas J. Pojeta Jr. | Associate CIO  
Enterprise Applications - Administrative Systems  
Office of the Chief Information Officer  
National Labor Relations Board (NLRB)  
1015 Half Street SE, 3rd Floor  
Washington, DC 20003

[thomas.pojeta@nlrb.gov](mailto:thomas.pojeta@nlrb.gov)

office - 202-273-4065

cell - 202-247-8634

=====

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**From:** O'Neill, Barbara A.

**Sent:** Friday, April 28, 2017 9:07 AM

**To:** Aburvasamy, Prem <[Prem.Aburvasamy@nlrb.gov](mailto:Prem.Aburvasamy@nlrb.gov)>; Pojeta, Thomas J.

<[Thomas.Pojeta@nlrb.gov](mailto:Thomas.Pojeta@nlrb.gov)>; Marks, Eric <[Eric.marks@nlrb.gov](mailto:Eric.marks@nlrb.gov)>; Williams, Kenneth J.

<[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>

**Cc:** Platt, Nancy <[Nancy.Platt@nlrb.gov](mailto:Nancy.Platt@nlrb.gov)>; Gaston, David <[David.Gaston@nlrb.gov](mailto:David.Gaston@nlrb.gov)>; Cullen, Christopher P. <[Christopher.Cullen@nlrb.gov](mailto:Christopher.Cullen@nlrb.gov)>

**Subject:** Sharepoint Instructions

Here is a more finalized draft of the instructions. Just some questions concerning who we indicate will be available to answer any questions someone might have while trying to move their emails and one question on last page – am I correct when I say that you will be able to move your emails from one folder to another?

This could go out today, but no later than Monday morning, if everyone is okay with it and my questions are answered. Thank you!



**From:** [Aburvasamy, Prem](#)  
**To:** [ML-NLRB-Everyone \(R\)](#)  
**Subject:** Further Guidance for New Agency Email Retention Policies – “Capstone” Approach  
**Date:** Monday, May 1, 2017 1:22:00 PM  
**Attachments:** [Capstone Instructions and attachment 5-1-17 \(003\).pdf](#)

---

All,

The attached Memorandum follows up on, and provides for further guidance to, the March 31, 2017 Memorandum, entitled “New Agency Email Retention Policies – ‘Capstone’ Approach”.

For additional information – [Email Retention Policies – Capstone Approach](#)

Thank you.  
Prem

Prem Aburvasamy | Chief Information Officer  
National Labor Relations Board (NLRB)  
1015 Half Street SE | Washington, DC 20570  
[prem.aburvasamy@nrlb.gov](mailto:prem.aburvasamy@nrlb.gov) | 202-273-3925

UNITED STATES GOVERNMENT  
*National Labor Relations Board*



**Memorandum**

**Date:** May 1, 2017

**To:** All Employees

**From:** Prem Aburvasamy, Chief Information Officer  
Kenneth Williams, Records Officer  
David Gaston, Branch Chief, E-Litigation Branch

**Subject:** Further Guidance for New Agency Email Retention Policies –  
"Capstone" Approach

---

This Memorandum follows up on, and provides for further guidance to, the March 31, 2017 Memorandum, entitled "New Agency Email Retention Policies – 'Capstone' Approach".

To comply with directives and guidance from the Office of Management and Budget (OMB) and the National Archives and Records Administration (NARA), the Agency is implementing a Capstone approach for managing Agency email records (see NARA Bulletin 2013-02 "Guidance on a New Approach to Managing Email Records"). Implementation is scheduled to begin on June 1, 2017. Under the Capstone approach, the Agency will manage email records based on the role of the email account user and/or office rather than on the content of each email record.

For Agency email account users not identified as Capstone custodians<sup>1</sup>, the Capstone approach will retain all emails for seven years. Email records older

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<sup>1</sup> Capstone custodians include the Chairman and Board members; Chief of Staff to the Chairman; the Solicitor; the Executive Secretary; Chief Counsels to Board Members; Chief Administrative Law Judge; Deputy Chief Administrative Law Judge; Director of the Office of Representation Appeals; Director of the Office of Congressional and Public Affairs; the Chief Information Officer; the General Counsel; the Deputy General Counsel; the Executive Assistant to the General Counsel; the Associate General Counsels of Operations-Management, Advice, Enforcement-Litigation, and Legal Counsel; Deputy Associate General Counsel of Enforcement-Litigation; Associate to the General Counsel of Operations-Management; the Chief Financial Officer; Director of Administration; the Designated Agency Ethics Official and the Inspector General.

than seven years will be deleted beginning June 1, 2017. Email records will be deleted perpetually and on a daily basis as the seven-year mark is reached.

To the extent that users have particular emails they wish to retain as historical records, these emails must be maintained outside the Agency’s enterprise email system. A SharePoint-based Email Archive Library is the designated repository for these email-based historical records. That Library will consist of three Folders labeled in SharePoint as Historical Value Case Matters, Institutional Processes–Knowledge, and Legal Research (see below for further explanation of the categories of emails).<sup>2</sup> Each Division and Branch will have its own Email Archive Library in which to upload these historical records. All historical records uploaded to the Email Archive Library will only be visible to members of that particular Division or Branch.<sup>3</sup>

To the extent that users wish to retain historical records, the recommended guidance for retention is as follows:

1. Legal Research
  - a. Documents containing information with significant legal research or reference value.
  - b. Documents containing general research unconnected to particular cases.
2. Historical Value Case Matters
  - a. Documents containing information with significant case reference value.
  - b. Documents that have sufficient historical or other value to warrant their continued preservation.
  - c. Documents showing how issues were handled in particular matters where it is foreseeable those issues may arise again.
3. Institutional Processes-Knowledge
  - a. Documents related to an office/branch's internal processes.
  - b. Documents showing how non-case matters are/were handled.

---

<sup>2</sup> If an office wishes to rename these folders or create a small number of additional folders, please contact [sharepointhelp@nrlrb.gov](mailto:sharepointhelp@nrlrb.gov).

<sup>3</sup> For example, the “front office” of the Division of Legal Counsel and each Branch within that Division (the FOIA Branch, E-Litigation Branch, and Contempt, Compliance, and Special Litigation Branch) will have a designated Email Archive Library in which to upload historical email records. Historical records uploaded to a particular Email Archive Library will be visible only to the members within that Branch or office.

This guidance supplements, but does not modify, any obligation to upload emails to NxGen, JCMS, or any other Agency system (see OM 12-80 (revised), OM 13-23). The new email retention policies also do not modify any other obligations of an Agency employee to preserve emails for pending or anticipated litigation.

Instructions for uploading historical records to the Email Archive library are attached to this memo.

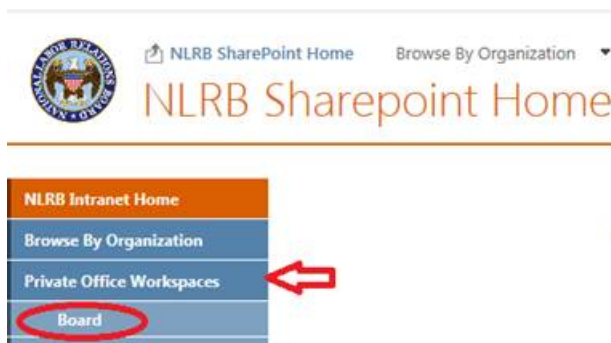
If you have any technical questions regarding Sharepoint, please contact [sharepointhelp@nlrb.gov](mailto:sharepointhelp@nlrb.gov). For other questions regarding Capstone policies, please feel free to contact the E-Litigation Branch ([david.gaston@nlrb.gov](mailto:david.gaston@nlrb.gov)) or the Division of Legal Counsel ([barbara.oneill@nlrb.gov](mailto:barbara.oneill@nlrb.gov)).

# Opening a SharePoint Library in Explorer View

The instructions that follow only work if you open SharePoint in Internet Explorer. Also, these instructions use the Division of Legal Counsel as representative, i.e., the SharePoint Home page for DLC.

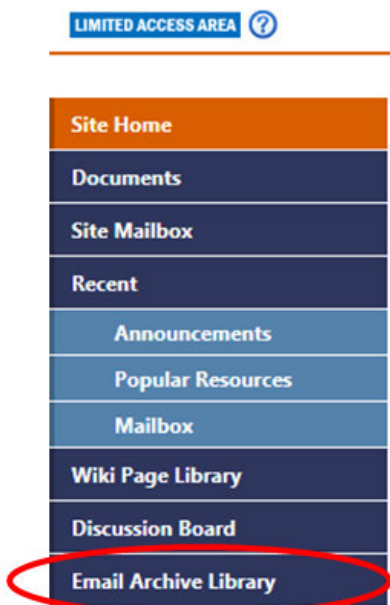
1. Open Internet Explorer and go to the NLRB Intranet site – <https://nlrb.sharepoint.com/SitePages/Home.aspx>
2. The Email Archive Libraries are found in each Office's respective **Private Office Workspace (POW)**. The POW is a site in SharePoint specifically designed for private collaboration between members of an office and will have information not open to all users of the NLRB Intranet.
  - a. You can access your Private Office Workspace from the NLRB SharePoint Intranet Home Page.
  - b. From the left side navigation, click the Private Office Workspace "drop down list" and select your respective Office.

Figure 1 Private Office Workspace



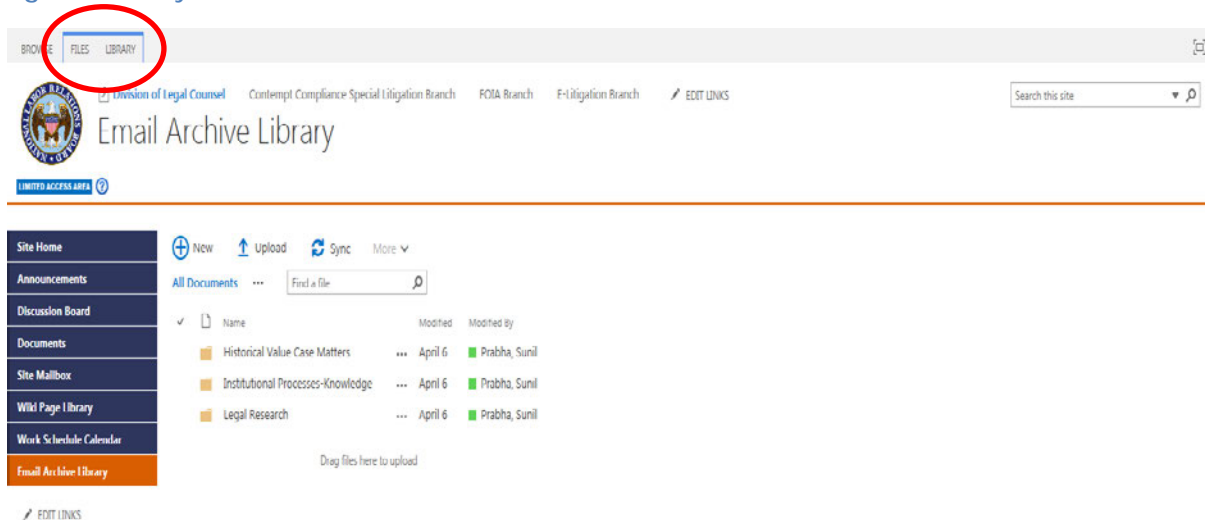
3. From the left navigation on your office's POW click Email Archive Library (Figure 2).

Figure 2. Email Archive Library



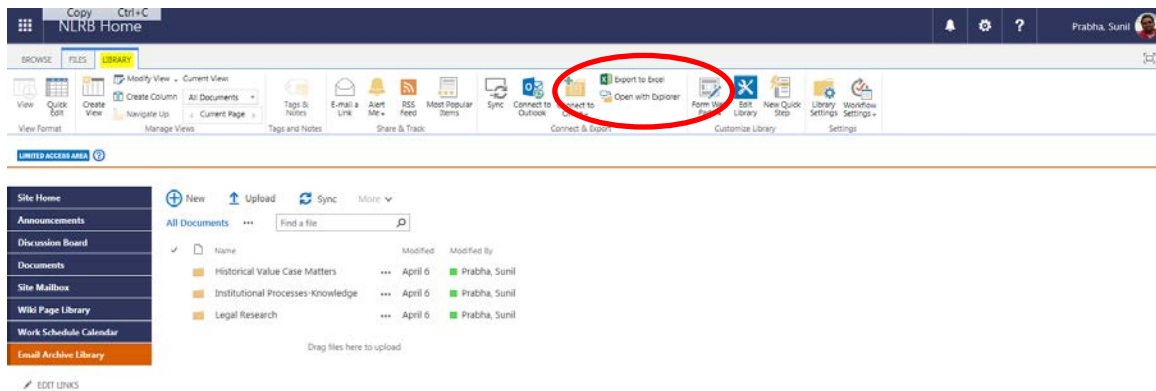
4. Select the '**Library**' tab located at the top left hand corner (see Figure 3. Library Tab).

Figure 3. Library Tab



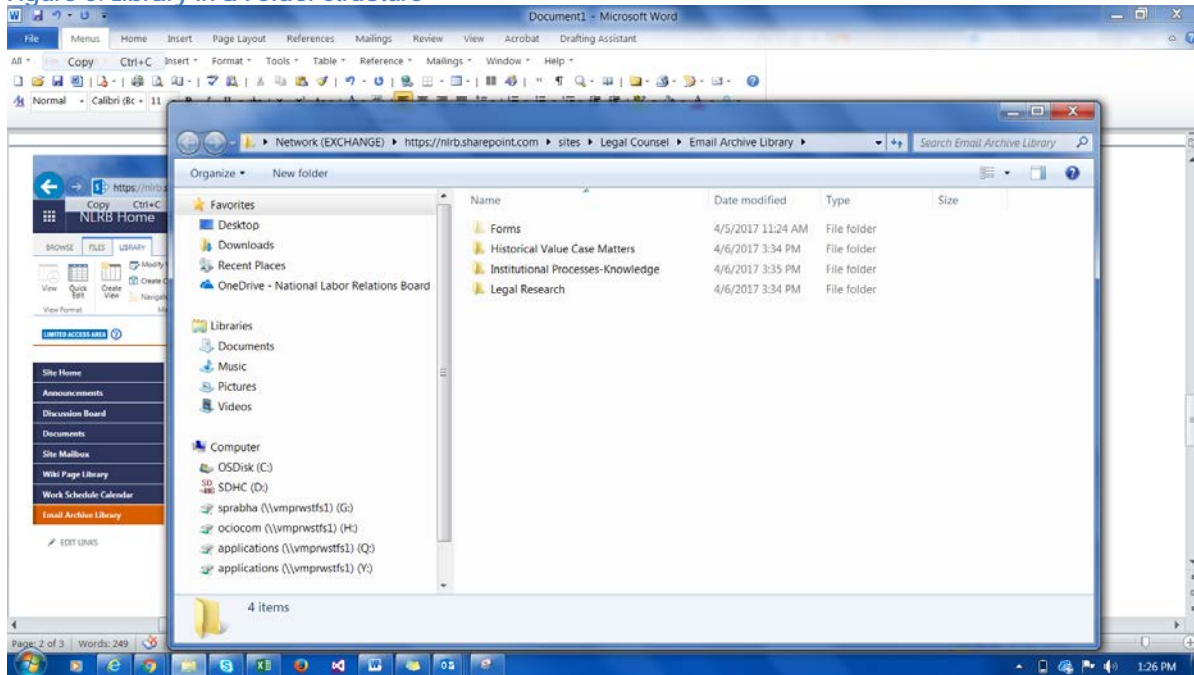
5. A list of additional options will appear in the toolbar/ribbon. In the toolbar/ribbon click the option **Open with Explorer** icon in the **Connect & Export** group (see Figure 4. Open in Explorer).

Figure 4. Open in Explorer



6. SharePoint will open the library in a network-type folder structure (Explorer View) that one may use to move the files in bulk, or manage the files and subfolders as if on one's local computer (see Figure 5. Library in a Folder Structure).

Figure 5. Library in a Folder Structure



You can now move your emails from Outlook into the three folders by dragging them over. If you make an error, i.e., you place an email in the wrong folder and/or you decide that you no longer wish to retain the email, you can delete that email from the folder. You may also drag/move emails between the folders.

**From:** [Mira, Robert](#)  
**To:** [Sanders, Laurie](#); [Williams, Kenneth J.](#); [Aburvasamy, Prem](#)  
**Cc:** [Marks, Eric](#)  
**Subject:** RE: New Agency Email Retention Policies - Capstone Approach - Additional Capstone Custodians  
**Date:** Wednesday, May 10, 2017 2:59:51 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Yes I was aware and I also forwarded the email Barbara O'Neil and Nancy Platt so hopefully they will tell me who is the Deputy Associate General Counsel for the Division of Enforcement .

---

**From:** Sanders, Laurie  
**Sent:** Wednesday, May 10, 2017 2:57 PM  
**To:** Mira, Robert <Robert.Mira@nlrb.gov>; Williams, Kenneth J. <Kenneth.Williams@nlrb.gov>; Aburvasamy, Prem <Prem.Aburvasamy@nlrb.gov>  
**Cc:** Marks, Eric <Eric.marks@nlrb.gov>  
**Subject:** RE: New Agency Email Retention Policies - Capstone Approach - Additional Capstone Custodians

Hey Robert,

Not sure if you were aware or not, but your list already includes the Chief ALJ, Deputy ALJ, Ethics Official. Your list is good except for Deputy Associate General Counsel for the Division of Enforcement. Do you know who that is? Thanks.

Laurie J. Sanders  
Associate Chief Information Officer, Infrastructure Section  
National Labor Relations Board  
1015 Half Street, SE., Suite 3068 | Washington, DC 20570  
[Laurie.sanders@nlrb.gov](mailto:Laurie.sanders@nlrb.gov)  
Office - 202-273-4095  
Cell - 202-375-0624

---

**From:** Mira, Robert  
**Sent:** Wednesday, May 10, 2017 1:55 PM  
**To:** Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>; Aburvasamy, Prem <[Prem.Aburvasamy@nlrb.gov](mailto:Prem.Aburvasamy@nlrb.gov)>  
**Cc:** Sanders, Laurie <[Laurie.Sanders@nlrb.gov](mailto:Laurie.Sanders@nlrb.gov)>; Marks, Eric <[Eric.marks@nlrb.gov](mailto:Eric.marks@nlrb.gov)>  
**Subject:** FW: New Agency Email Retention Policies - Capstone Approach - Additional Capstone Custodians

Please verify the list below of CAPSTONE officials.

If you find any discrepancies please let me know as soon as possible.

All members of the list below will have their email kept indefinitely per designation as a CAPSTONE



official.

Per the memo attached the following are also members of the list of CAPSTONE Officials:

Chief Administrative Law Judge

Deputy Chief Administrative Law Judge

Deputy Associate General Counsel for the Division of Enforcement

Designated Agency Ethics Official

^ Recipients (25) [Clear all](#)

Tursell, Beth	Beth.Tursell@nlrb.gov
Aburvasamy, Prem	Prem.Aburvasamy@nlrb.gov
Ferguson, John H.	John.Ferguson@nlrb.gov
Miscimarra, Philip A.	Philip.Miscimarra@nlrb.gov
Parekh, Mehul	Mehul.Parekh@nlrb.gov
Winkler, Peter D.	Peter.Winkler@nlrb.gov
Dichner, Ellen	Ellen.Dichner@nlrb.gov
Shinners, Gary W.	Gary.Shinners@nlrb.gov
Carlton, Peter J.	Peter.Carlton@nlrb.gov
Murphy, James R.	James.Murphy@nlrb.gov
Amchan, Arthur	Arthur.Amchan@nlrb.gov
Ketcham, Lori	Lori.Ketcham@nlrb.gov
Griffin, Richard F.	Richard.Griffin@nlrb.gov
Berry, David P.	David.Berry@nlrb.gov
Schiff, Robert	Robert.Schiff@nlrb.gov
Schoone-Jongen, Terence G.	Terence.Schoone-Jongen@nlrb.gov
Abruzzo, Jennifer	Jennifer.Abruzzo@nlrb.gov
Kearney, Barry J.	barry.kearney@nlrb.gov
Giannasi, Robert (ALJ)	Robert.Giannasi@nlrb.gov
Pearce, Mark G.	Mark.Pearce@nlrb.gov
Colwell, John F.	John.Colwell@nlrb.gov
O'Neill, Barbara A.	Barbara.O'Neill@nlrb.gov
Hamilton, Lasham	Lasham.Hamilton@nlrb.gov
Bock, Richard	Richard.Bock@nlrb.gov
McFerran, Lauren	Lauren.McFerran@nlrb.gov

**From:** Aburvasamy, Prem

**Sent:** Monday, April 17, 2017 10:10 AM

**To:** Marks, Eric <[Eric.marks@nlrb.gov](mailto:Eric.marks@nlrb.gov)>; Mira, Robert <[Robert.Mira@nlrb.gov](mailto:Robert.Mira@nlrb.gov)>

**Subject:** FW: New Agency Email Retention Policies - Capstone Approach - Additional Capstone Custodians

FYI...

---

**From:** O'Neill, Barbara A.

**Sent:** Wednesday, April 05, 2017 9:20 AM

**To:** Giannasi, Robert (ALJ) <[Robert.Giannasi@nlrb.gov](mailto:Robert.Giannasi@nlrb.gov)>; Amchan, Arthur <[Arthur.Amchan@nlrb.gov](mailto:Arthur.Amchan@nlrb.gov)>; Dreeben, Linda J. <[Linda.Dreeben@nlrb.gov](mailto:Linda.Dreeben@nlrb.gov)>; Ketcham, Lori <[Lori.Ketcham@nlrb.gov](mailto:Lori.Ketcham@nlrb.gov)>

**Cc:** Aburvasamy, Prem <[Prem.Aburvasamy@nlrb.gov](mailto:Prem.Aburvasamy@nlrb.gov)>; Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>; Gaston, David <[David.Gaston@nlrb.gov](mailto:David.Gaston@nlrb.gov)>; Platt, Nancy <[Nancy.Platt@nlrb.gov](mailto:Nancy.Platt@nlrb.gov)>; Cullen, Christopher P. <[Christopher.Cullen@nlrb.gov](mailto:Christopher.Cullen@nlrb.gov)>; Griffin, Richard F. <[Richard.Griffin@nlrb.gov](mailto:Richard.Griffin@nlrb.gov)>; Abruzzo, Jennifer <[Jennifer.Abruzzo@nlrb.gov](mailto:Jennifer.Abruzzo@nlrb.gov)>; Miscimarra, Philip A. <[Philip.Miscimarra@nlrb.gov](mailto:Philip.Miscimarra@nlrb.gov)>; Schiff, Robert <[Robert.Schiff@nlrb.gov](mailto:Robert.Schiff@nlrb.gov)>; Ferguson, John H. <[John.Ferguson@nlrb.gov](mailto:John.Ferguson@nlrb.gov)>; Jones, Harry <[Harry.Jones@nlrb.gov](mailto:Harry.Jones@nlrb.gov)>

**Subject:** New Agency Email Retention Policies - Capstone Approach - Additional Capstone Custodians

Please see the attached memorandum concerning additional Capstone custodians. Feel free to call if you have any questions.

**From:** [Marks, Eric](#)  
**To:** [Mira, Robert](#); [Sanders, Laurie](#); [Aburvasamy, Prem](#); [Williams, Kenneth J.](#)  
**Subject:** RE: New Agency Email Retention Policies - Capstone Approach - Additional Capstone Custodians  
**Date:** Wednesday, May 10, 2017 3:27:59 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Robert,  
Thank you.

Related, Nancy gave me a list of additional non-Capstone people to be placed on Litigation Hold. I'll review the list first to limit the list to new additions only. I'll follow up in a separate email thread upon completion.

Respectfully,  
Eric

---

**From:** Mira, Robert  
**Sent:** Wednesday, May 10, 2017 3:26 PM  
**To:** Sanders, Laurie <[Laurie.Sanders@nlrb.gov](mailto:Laurie.Sanders@nlrb.gov)>; Aburvasamy, Prem <[Prem.Aburvasamy@nlrb.gov](mailto:Prem.Aburvasamy@nlrb.gov)>; Marks, Eric <[Eric.marks@nlrb.gov](mailto:Eric.marks@nlrb.gov)>; Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>  
**Subject:** FW: New Agency Email Retention Policies - Capstone Approach - Additional Capstone Custodians

FYI

I'll make the corrections noted by Nancy.

---

**From:** Platt, Nancy  
**Sent:** Wednesday, May 10, 2017 3:13 PM  
**To:** Mira, Robert <[Robert.Mira@nlrb.gov](mailto:Robert.Mira@nlrb.gov)>  
**Cc:** O'Neill, Barbara A. <[Barbara.O'Neill@nlrb.gov](mailto:Barbara.O'Neill@nlrb.gov)>; Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>  
**Subject:** RE: New Agency Email Retention Policies - Capstone Approach - Additional Capstone Custodians

Robert,

A few corrections:

Linda Dreeben is missing from the list (she is the Deputy Associate General Counsel for Enforcement Litigation, one of the additional individuals we designated)

Richard Bock is *not* in one of the Capstone positions

Terence Schoone-Jongen is also *not* in a designated Capstone position. Although he (she?) is now

apparently heading up the Office of Representation Appeals, that is because the *Director* of the Office of Representation Appeals position is vacant. But we do not designate folks as Capstone officials unless they are actually in the appropriate Capstone position.

Thanks,  
Nancy

---

**From:** Mira, Robert  
**Sent:** Wednesday, May 10, 2017 2:08 PM  
**To:** O'Neill, Barbara A. <Barbara.O'Neill@nlrb.gov>  
**Cc:** Platt, Nancy <[Nancy.Platt@nlrb.gov](mailto:Nancy.Platt@nlrb.gov)>  
**Subject:** FW: New Agency Email Retention Policies - Capstone Approach - Additional Capstone Custodians

Per Kenneth Williams request I'm also forwarding you the list below for confirmation.

Thanks

Robert Mira  
NLRB Email Manager

---

**From:** Mira, Robert  
**Sent:** Wednesday, May 10, 2017 1:55 PM  
**To:** Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>; Aburvasamy, Prem <[Prem.Aburvasamy@nlrb.gov](mailto:Prem.Aburvasamy@nlrb.gov)>  
**Cc:** Sanders, Laurie <[Laurie.Sanders@nlrb.gov](mailto:Laurie.Sanders@nlrb.gov)>; Marks, Eric <[Eric.marks@nlrb.gov](mailto:Eric.marks@nlrb.gov)>  
**Subject:** FW: New Agency Email Retention Policies - Capstone Approach - Additional Capstone Custodians

Please verify the list below of CAPSTONE officials.

If you find any discrepancies please let me know as soon as possible.

All members of the list below will have their email kept indefinitely per designation as a CAPSTONE official.

Per the memo attached the following are also members of the list of CAPSTONE Officials:

Chief Administrative Law Judge  
Deputy Chief Administrative Law Judge  
Deputy Associate General Counsel for the Division of Enforcement  
Designated Agency Ethics Official

^ Recipients (25) [Clear all](#)

Tursell, Beth	Beth.Tursell@nlrb.gov
Aburvasamy, Prem	Prem.Aburvasamy@nlrb.gov
Ferguson, John H.	John.Ferguson@nlrb.gov
Miscimarra, Philip A.	Philip.Miscimarra@nlrb.gov
Parekh, Mehul	Mehul.Parekh@nlrb.gov
Winkler, Peter D.	Peter.Winkler@nlrb.gov
Dichner, Ellen	Ellen.Dichner@nlrb.gov
Shinners, Gary W.	Gary.Shinners@nlrb.gov
Carlton, Peter J.	Peter.Carlton@nlrb.gov
Murphy, James R.	James.Murphy@nlrb.gov
Amchan, Arthur	Arthur.Amchan@nlrb.gov
Ketcham, Lori	Lori.Ketcham@nlrb.gov
Griffin, Richard F.	Richard.Griffin@nlrb.gov
Berry, David P.	David.Berry@nlrb.gov
Schiff, Robert	Robert.Schiff@nlrb.gov
Schoone-Jongen, Terence G.	Terence.Schoone-Jongen@nlrb.gov
Abruzzo, Jennifer	Jennifer.Abruzzo@nlrb.gov
Kearney, Barry J.	barry.kearney@nlrb.gov
Giannasi, Robert (ALJ)	Robert.Giannasi@nlrb.gov
Pearce, Mark G.	Mark.Pearce@nlrb.gov
Colwell, John F.	John.Colwell@nlrb.gov
O'Neill, Barbara A.	Barbara.O'Neill@nlrb.gov
Hamilton, Lasharn	Lasharn.Hamilton@nlrb.gov
Bock, Richard	Richard.Bock@nlrb.gov
McFerran, Lauren	Lauren.McFerran@nlrb.gov

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**From:** Aburvasamy, Prem

**Sent:** Monday, April 17, 2017 10:10 AM

**To:** Marks, Eric <[Eric.marks@nlrb.gov](mailto:Eric.marks@nlrb.gov)>; Mira, Robert <[Robert.Mira@nlrb.gov](mailto:Robert.Mira@nlrb.gov)>

**Subject:** FW: New Agency Email Retention Policies - Capstone Approach - Additional Capstone Custodians

FYI...

---

**From:** O'Neill, Barbara A.

**Sent:** Wednesday, April 05, 2017 9:20 AM

**To:** Giannasi, Robert (ALJ) <[Robert.Giannasi@nlrb.gov](mailto:Robert.Giannasi@nlrb.gov)>; Amchan, Arthur <[Arthur.Amchan@nlrb.gov](mailto:Arthur.Amchan@nlrb.gov)>; Dreeben, Linda J. <[Linda.Dreeben@nlrb.gov](mailto:Linda.Dreeben@nlrb.gov)>; Ketcham, Lori <[Lori.Ketcham@nlrb.gov](mailto:Lori.Ketcham@nlrb.gov)>

**Cc:** Aburvasamy, Prem <[Prem.Aburvasamy@nlrb.gov](mailto:Prem.Aburvasamy@nlrb.gov)>; Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>; Gaston, David <[David.Gaston@nlrb.gov](mailto:David.Gaston@nlrb.gov)>; Platt, Nancy <[Nancy.Platt@nlrb.gov](mailto:Nancy.Platt@nlrb.gov)>; Cullen, Christopher P. <[Christopher.Cullen@nlrb.gov](mailto:Christopher.Cullen@nlrb.gov)>; Griffin, Richard F. <[Richard.Griffin@nlrb.gov](mailto:Richard.Griffin@nlrb.gov)>; Abruzzo, Jennifer <[Jennifer.Abruzzo@nlrb.gov](mailto:Jennifer.Abruzzo@nlrb.gov)>; Miscimarra, Philip A. <[Philip.Miscimarra@nlrb.gov](mailto:Philip.Miscimarra@nlrb.gov)>; Schiff, Robert <[Robert.Schiff@nlrb.gov](mailto:Robert.Schiff@nlrb.gov)>; Ferguson, John H. <[John.Ferguson@nlrb.gov](mailto:John.Ferguson@nlrb.gov)>; Jones, Harry <[Harry.Jones@nlrb.gov](mailto:Harry.Jones@nlrb.gov)>

**Subject:** New Agency Email Retention Policies - Capstone Approach - Additional Capstone Custodians

Please see the attached memorandum concerning additional Capstone custodians. Feel free to call if you have any questions.

**From:** [Aburvasamy, Prem](#)  
**To:** [ML-NLRB-Everyone \(R\)](#)  
**Subject:** Implementation of E-Mail Archiving Policy: 15-Day Notice  
**Date:** Tuesday, May 16, 2017 10:20:04 AM

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All,

This is a reminder that the Agency's e-mail archiving policy ("Capstone") will be fully implemented on Thursday, June 1, 2017.

Under the Capstone policy, the Agency will permanently retain all e-mail messages of certain designated "Capstone Officials," who are the senior policymakers in the Agency. For all other Agency e-mail account users, messages will be retained for seven years. **E-mail records that are older than seven years will be deleted effective June 1, 2017.** E-mail messages will be deleted daily on an ongoing basis as they age beyond the seven-year retention period.

For those limited agency emails older than seven years that an employee wishes to retain as historical records, see the email with the attached memorandum dated May 1, 2017, with instructions for moving those to the SharePoint Email Archive Library for that particular employee's office.

To the extent that employees may want to keep personal e-mail messages that are in their Agency accounts, please be aware that the Agency does not have the tools to support personal e-mail retention. The only option available to employees is to forward personal e-mail messages that they may want to keep to a personal e-mail account.

More information may be found by clicking here: [Email Retention Policies – Capstone Approach](#)

Thank you.  
Prem

Prem Aburvasamy | Chief Information Officer  
National Labor Relations Board (NLRB)  
1015 Half Street SE | Washington, DC 20570  
[prem.aburvasamy@nlrb.gov](mailto:prem.aburvasamy@nlrb.gov) | 202-273-3925

**From:** [Mira, Robert](#)  
**To:** [Williams, Kenneth J.](#)  
**Cc:** [Sanders, Laurie](#); [Marks, Eric](#)  
**Subject:** FW: New Agency Email Retention Policies - Capstone Approach - Additional Capstone Custodians  
**Date:** Thursday, May 18, 2017 2:10:13 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[Capstone Custodians.xlsx](#)

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See attached spreadsheet which I made with the same names.

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**From:** Platt, Nancy  
**Sent:** Tuesday, May 16, 2017 3:42 PM  
**To:** Mira, Robert <Robert.Mira@nlrb.gov>  
**Cc:** O'Neill, Barbara A. <Barbara.O'Neill@nlrb.gov>; Williams, Kenneth J. <Kenneth.Williams@nlrb.gov>  
**Subject:** RE: New Agency Email Retention Policies - Capstone Approach - Additional Capstone Custodians

That is correct.

By my count, there are now [31 positions](#) we've designated, of which, for now, 7 are vacant, leaving the 24 on your list:

1. Chairman
- 2-5. Board members (4) (2 are VACANT)
6. Chief of Staff to the Chairman;
7. Solicitor (VACANT)
8. Executive Secretary
- 9-13. Chief Counsels to Board Members (5)
14. Chief Information Officer
15. General Counsel
16. Deputy General Counsel
17. Executive Assistant to the General Counsel (VACANT)
18. Associate General Counsel of Operations-Management (VACANT)
19. Associate General Counsel, Advice
20. Associate General Counsel, Enforcement-Litigation
21. Associate General Counsel, Legal Counsel
22. Associate to the General Counsel of Operations-Management
23. Deputy Associate General Counsel, Appellate and Supreme Court Litigation
24. Chief Financial Officer
25. Director of Administration
26. Inspector General
27. Director, Office of Representation Appeals (VACANT)
28. Chief ALJ



- 29. Deputy Chief ALJ
- 30. Designated Agency Ethics Official
- 31. Director, Office of Congressional and Public Affairs (**VACANT**)

---

**From:** Mira, Robert

**Sent:** Tuesday, May 16, 2017 3:20 PM

**To:** Platt, Nancy <[Nancy.Platt@nlrb.gov](mailto:Nancy.Platt@nlrb.gov)>

**Cc:** O'Neill, Barbara A. <[Barbara.O'Neill@nlrb.gov](mailto:Barbara.O'Neill@nlrb.gov)>; Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>

**Subject:** RE: New Agency Email Retention Policies - Capstone Approach - Additional Capstone Custodians

Nancy

I don't think I've sent you the latest list once the corrections were done.

Please verify and let me know if there are any other changes,

^ Recipients (24) <a href="#">Clear all</a>	
Tursell, Beth	Beth.Tursell@nlrb.gov
Aburvasamy, Prem	Prem.Aburvasamy@nlrb.gov
Ferguson, John H.	John.Ferguson@nlrb.gov
Miscimarra, Philip A.	Philip.Miscimarra@nlrb.gov
Dreeben, Linda J.	Linda.Dreeben@nlrb.gov
Parekh, Mehul	Mehul.Parekh@nlrb.gov
Winkler, Peter D.	Peter.Winkler@nlrb.gov
Dichner, Ellen	Ellen.Dichner@nlrb.gov
Shinners, Gary W.	Gary.Shinners@nlrb.gov
Carlton, Peter J.	Peter.Carlton@nlrb.gov
Murphy, James R.	James.Murphy@nlrb.gov
Amchan, Arthur	Arthur.Amchan@nlrb.gov
Ketcham, Lori	Lori.Ketcham@nlrb.gov
Griffin, Richard F.	Richard.Griffin@nlrb.gov
Berry, David P.	David.Berry@nlrb.gov
Schiff, Robert	Robert.Schiff@nlrb.gov
Abruzzo, Jennifer	Jennifer.Abruzzo@nlrb.gov

Kearney, Barry J.	barry.kearney@nlrb.gov
Giannasi, Robert (ALJ)	Robert.Giannasi@nlrb.gov
Pearce, Mark G.	Mark.Pearce@nlrb.gov
Colwell, John F.	John.Colwell@nlrb.gov
O'Neill, Barbara A.	Barbara.O'Neill@nlrb.gov
Hamilton, Lasharn	Lasharn.Hamilton@nlrb.gov
McFerran, Lauren	Lauren.McFerran@nlrb.gov

Robert Mira  
National Labor Relations Board  
1015 Half Street SE, Suite 3064  
Washington, DC 20570

202-273-0201

---

**From:** Mira, Robert  
**Sent:** Wednesday, May 10, 2017 3:25 PM  
**To:** Platt, Nancy <[Nancy.Platt@nlrb.gov](mailto:Nancy.Platt@nlrb.gov)>  
**Cc:** O'Neill, Barbara A. <[Barbara.O'Neill@nlrb.gov](mailto:Barbara.O'Neill@nlrb.gov)>; Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>  
**Subject:** RE: New Agency Email Retention Policies - Capstone Approach - Additional Capstone Custodians

Thanks for the corrections

---

**From:** Platt, Nancy  
**Sent:** Wednesday, May 10, 2017 3:13 PM  
**To:** Mira, Robert <[Robert.Mira@nlrb.gov](mailto:Robert.Mira@nlrb.gov)>  
**Cc:** O'Neill, Barbara A. <[Barbara.O'Neill@nlrb.gov](mailto:Barbara.O'Neill@nlrb.gov)>; Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>  
**Subject:** RE: New Agency Email Retention Policies - Capstone Approach - Additional Capstone Custodians

Robert,

A few corrections:

Linda Dreeben is missing from the list (she is the Deputy Associate General Counsel for Enforcement Litigation, one of the additional individuals we designated)

Richard Bock is *not* in one of the Capstone positions

Terence Schoone-Jongen is also *not* in a designated Capstone position. Although he (she?) is now apparently heading up the Office of Representation Appeals, that is because the *Director* of the Office of Representation Appeals position is vacant. But we do not designate folks as Capstone officials unless they are actually in the appropriate Capstone position.

Thanks,  
Nancy

---

**From:** Mira, Robert  
**Sent:** Wednesday, May 10, 2017 2:08 PM  
**To:** O'Neill, Barbara A. <Barbara.O'Neill@nrb.gov>  
**Cc:** Platt, Nancy <[Nancy.Platt@nrb.gov](mailto:Nancy.Platt@nrb.gov)>  
**Subject:** FW: New Agency Email Retention Policies - Capstone Approach - Additional Capstone Custodians

Per Kenneth Williams request I'm also forwarding you the list below for confirmation.

Thanks

Robert Mira  
NLRB Email Manager

---

**From:** Mira, Robert  
**Sent:** Wednesday, May 10, 2017 1:55 PM  
**To:** Williams, Kenneth J. <[Kenneth.Williams@nrb.gov](mailto:Kenneth.Williams@nrb.gov)>; Aburvasamy, Prem <[Prem.Aburvasamy@nrb.gov](mailto:Prem.Aburvasamy@nrb.gov)>  
**Cc:** Sanders, Laurie <[Laurie.Sanders@nrb.gov](mailto:Laurie.Sanders@nrb.gov)>; Marks, Eric <[Eric.marks@nrb.gov](mailto:Eric.marks@nrb.gov)>  
**Subject:** FW: New Agency Email Retention Policies - Capstone Approach - Additional Capstone Custodians

Please verify the list below of CAPSTONE officials.

If you find any discrepancies please let me know as soon as possible.

All members of the list below will have their email kept indefinitely per designation as a CAPSTONE official.

Per the memo attached the following are also members of the list of CAPSTONE Officials:

Chief Administrative Law Judge  
Deputy Chief Administrative Law Judge  
Deputy Associate General Counsel for the Division of Enforcement  
Designated Agency Ethics Official

^ Recipients (25) [Clear all](#)

Tursell, Beth	Beth.Tursell@nlrb.gov
Aburvasamy, Prem	Prem.Aburvasamy@nlrb.gov
Ferguson, John H.	John.Ferguson@nlrb.gov
Miscimarra, Philip A.	Philip.Miscimarra@nlrb.gov
Parekh, Mehul	Mehul.Parekh@nlrb.gov
Winkler, Peter D.	Peter.Winkler@nlrb.gov
Dichner, Ellen	Ellen.Dichner@nlrb.gov
Shinners, Gary W.	Gary.Shinners@nlrb.gov
Carlton, Peter J.	Peter.Carlton@nlrb.gov
Murphy, James R.	James.Murphy@nlrb.gov
Amchan, Arthur	Arthur.Amchan@nlrb.gov
Ketcham, Lori	Lori.Ketcham@nlrb.gov
Griffin, Richard F.	Richard.Griffin@nlrb.gov
Berry, David P.	David.Berry@nlrb.gov
Schiff, Robert	Robert.Schiff@nlrb.gov
Schoone-Jongen, Terence G.	Terence.Schoone-Jongen@nlrb.gov
Abruzzo, Jennifer	Jennifer.Abruzzo@nlrb.gov
Kearney, Barry J.	barry.kearney@nlrb.gov
Giannasi, Robert (ALJ)	Robert.Giannasi@nlrb.gov
Pearce, Mark G.	Mark.Pearce@nlrb.gov
Colwell, John F.	John.Colwell@nlrb.gov
O'Neill, Barbara A.	Barbara.O'Neill@nlrb.gov
Hamilton, Lasharn	Lasharn.Hamilton@nlrb.gov
Bock, Richard	Richard.Bock@nlrb.gov
McFerran, Lauren	Lauren.McFerran@nlrb.gov

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**From:** Aburvasamy, Prem

**Sent:** Monday, April 17, 2017 10:10 AM

**To:** Marks, Eric <[Eric.marks@nlrb.gov](mailto:Eric.marks@nlrb.gov)>; Mira, Robert <[Robert.Mira@nlrb.gov](mailto:Robert.Mira@nlrb.gov)>

**Subject:** FW: New Agency Email Retention Policies - Capstone Approach - Additional Capstone Custodians

FYI...

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**From:** O'Neill, Barbara A.

**Sent:** Wednesday, April 05, 2017 9:20 AM

**To:** Giannasi, Robert (ALJ) <[Robert.Giannasi@nlrb.gov](mailto:Robert.Giannasi@nlrb.gov)>; Amchan, Arthur <[Arthur.Amchan@nlrb.gov](mailto:Arthur.Amchan@nlrb.gov)>; Dreeben, Linda J. <[Linda.Dreeben@nlrb.gov](mailto:Linda.Dreeben@nlrb.gov)>; Ketcham, Lori <[Lori.Ketcham@nlrb.gov](mailto:Lori.Ketcham@nlrb.gov)>

**Cc:** Aburvasamy, Prem <[Prem.Aburvasamy@nlrb.gov](mailto:Prem.Aburvasamy@nlrb.gov)>; Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>; Gaston, David <[David.Gaston@nlrb.gov](mailto:David.Gaston@nlrb.gov)>; Platt, Nancy <[Nancy.Platt@nlrb.gov](mailto:Nancy.Platt@nlrb.gov)>; Cullen, Christopher P. <[Christopher.Cullen@nlrb.gov](mailto:Christopher.Cullen@nlrb.gov)>; Griffin, Richard F. <[Richard.Griffin@nlrb.gov](mailto:Richard.Griffin@nlrb.gov)>; Abruzzo, Jennifer <[Jennifer.Abruzzo@nlrb.gov](mailto:Jennifer.Abruzzo@nlrb.gov)>; Miscimarra, Philip A. <[Philip.Miscimarra@nlrb.gov](mailto:Philip.Miscimarra@nlrb.gov)>; Schiff, Robert <[Robert.Schiff@nlrb.gov](mailto:Robert.Schiff@nlrb.gov)>; Ferguson, John H. <[John.Ferguson@nlrb.gov](mailto:John.Ferguson@nlrb.gov)>; Jones, Harry <[Harry.Jones@nlrb.gov](mailto:Harry.Jones@nlrb.gov)>

**Subject:** New Agency Email Retention Policies - Capstone Approach - Additional Capstone Custodians

Please see the attached memorandum concerning additional Capstone custodians. Feel free to call if you have any questions.

## Capstone Custodian Officials

Preserve emails and no autodeletion

Tursell, Beth	Associate to the General Counsel
Aburvasamy, Prem	Chief Information Officer
Ferguson, John H.	Associate General Counsel
Miscimarra, Philip A.	Chairman
Parekh, Mehul	Chief Financial Officer
Winkler, Peter D.	Chief Counsel
Dichner, Ellen	Chief Counsel to Pearce
Shinners, Gary W.	Executive Secretary
Carlton, Peter J.	Chief Counsel
Murphy, James R.	Chief Counsel
Amchan, Arthur	Deputy Chief ALJ
Ketcham, Lori	Associate General Counsel
Griffin, Richard F.	General Counsel
Berry, David P.	Inspector General
Schiff, Robert	Chief of Staff
Schoone-Jongen, Terence G.	Assistant Chief Counsel
Abruzzo, Jennifer	Deputy General Counsel
Kearney, Barry J.	Associate General Counsel
Giannasi, Robert (ALJ)	Chief ALJ
Pearce, Mark G.	Board Member
Colwell, John F.	Chief Counsel
O'Neill, Barbara A.	Associate General Counsel
Hamilton, Lasharn	Director
Bock, Richard	Deputy Associate General Counsel
McFerran, Lauren	Board Member

**From:** [Aburvasamy, Prem](#)  
**To:** [Plummer, Patrick R.](#); [Sanders, Laurie](#)  
**Subject:** RE: Implementation of E-Mail Archiving Policy: Reminder! Reminder!  
**Date:** Tuesday, May 30, 2017 4:17:00 PM

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Laurie,

Can you assist Patrick?

Thanks.  
Prem

---

**From:** Plummer, Patrick R.  
**Sent:** Tuesday, May 30, 2017 3:39 PM  
**To:** Aburvasamy, Prem <[Prem.Aburvasamy@nlrb.gov](mailto:Prem.Aburvasamy@nlrb.gov)>  
**Subject:** RE: Implementation of E-Mail Archiving Policy: Reminder! Reminder!

Prem,  
I have done that. The oldest email I have showing is June 4, 2012.  
~Pat

---

**From:** Aburvasamy, Prem  
**Sent:** Tuesday, May 30, 2017 3:38 PM  
**To:** Plummer, Patrick R. <[Patrick.Plummer@nlrb.gov](mailto:Patrick.Plummer@nlrb.gov)>  
**Subject:** RE: Implementation of E-Mail Archiving Policy: Reminder! Reminder!

Patrick,

We have not implemented anything yet. So scroll to the bottom of the email list and click on “click here to view more...”.

Thanks.  
Prem

---

**From:** Plummer, Patrick R.  
**Sent:** Tuesday, May 30, 2017 9:48 AM  
**To:** Aburvasamy, Prem <[Prem.Aburvasamy@nlrb.gov](mailto:Prem.Aburvasamy@nlrb.gov)>  
**Subject:** RE: Implementation of E-Mail Archiving Policy: Reminder! Reminder!

Hi Prem,  
I have a question: it appears to me that my emails only go back 5 years (or so)—already. (June 4, 2012—as of today.) There are a few items I wouldn't mind retrieving from further back, but it appears that they are already gone.  
What am I doing wrong? Thanks.  
~Pat

---

**From:** Aburvasamy, Prem

**Sent:** Tuesday, May 30, 2017 9:32 AM

**To:** ML-NLRB-Everyone (R) <[ML-NLRB-Everyone@nlrb.gov](mailto:ML-NLRB-Everyone@nlrb.gov)>

**Subject:** RE: Implementation of E-Mail Archiving Policy: Reminder! Reminder!

**Reminder! Reminder! Reminder!**

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**From:** Aburvasamy, Prem

**Sent:** Thursday, May 25, 2017 8:58 AM

**To:** ML-NLRB-Everyone (R) <[ML-NLRB-Everyone@nlrb.gov](mailto:ML-NLRB-Everyone@nlrb.gov)>

**Subject:** RE: Implementation of E-Mail Archiving Policy: Reminder

All,

This is a reminder that the Agency's e-mail archiving policy ("Capstone") will be fully implemented on Thursday, June 1, 2017.

Under the Capstone policy, the Agency will permanently retain all e-mail messages of certain designated "Capstone Officials," who are the senior policymakers in the Agency. For all other Agency e-mail account users, messages will be retained for seven years. **E-mail records that are older than seven years will be deleted effective June 1, 2017.** E-mail messages will be deleted daily on an ongoing basis as they age beyond the seven-year retention period.

For those limited agency emails older than seven years that an employee wishes to retain as historical records, see the email with the attached memorandum dated May 1, 2017, with instructions for moving those to the SharePoint Email Archive Library for that particular employee's office.

To the extent that employees may want to keep personal e-mail messages that are in their Agency accounts, please be aware that the Agency does not have the tools to support personal e-mail retention. The only option available to employees is to forward personal e-mail messages that they may want to keep to a personal e-mail account.

More information may be found by clicking here: [Email Retention Policies – Capstone Approach](#)

Thank you.  
Prem

Prem Aburvasamy | Chief Information Officer  
National Labor Relations Board (NLRB)  
1015 Half Street SE | Washington, DC 20570  
[prem.aburvasamy@nlrb.gov](mailto:prem.aburvasamy@nlrb.gov) | 202-273-3925



**From:** [Aburvasamy, Prem](#)  
**To:** [ML-NLRB-Everyone \(R\)](#)  
**Subject:** Capstone Reminder Guidance – New Agency Email Retention Policies  
**Date:** Thursday, July 6, 2017 9:14:00 AM  
**Attachments:** [Capstone Reminder Memo Final 7-6-17.pdf](#)

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All,

This message is a reminder of the NLRB's data management practices following the June 1<sup>st</sup> implementation of the Capstone email retention policy. Specifically, this message is to remind all Agency employees that emails are to be retained in appropriate and identified Agency electronic systems that support records management and litigation requirements including the ability to identify, retrieve, and retain the records for as long as they are needed.

Please read the attached Memo for additional information.

Thanks.

Prem

Prem Aburvasamy | Chief Information Officer  
National Labor Relations Board (NLRB)  
1015 Half Street SE | Washington, DC 20570  
[prem.aburvasamy@nrlb.gov](mailto:prem.aburvasamy@nrlb.gov) | 202-273-3925

**UNITED STATES GOVERNMENT**  
**National Labor Relations Board**  
**Office of the General Counsel**



**MEMORANDUM**

DATE: July 6, 2017

TO: All Employees

FROM: Prem Aburvasamy, Chief Information Officer  
Kenneth Williams, Records Officer  
David Gaston, Branch Chief, E-Litigation Branch

SUBJECT: Capstone Reminder Guidance – New Agency Email Retention Policies

This message is a reminder of the NLRB's data management practices following the June 1<sup>st</sup> implementation of the Capstone email retention policy. Specifically, this message is to remind all Agency employees that emails are to be retained in appropriate and identified Agency electronic systems that support records management and litigation requirements including the ability to identify, retrieve, and retain the records for as long as they are needed. The following electronic systems are approved for the management of e-mails: (1) Outlook, (2) NxGen, (3) offices' new Email Archive Libraries,<sup>1</sup> and (4) systems where emails are kept as official records (e.g., systems in use by Human Resources, Special Counsel, and the Inspector General).

Employees keeping Agency emails outside of these systems expose the Agency to risk. Unaccounted email *circumvents the effect of the Capstone email retention policy* and reduces the Agency's ability to accurately respond to outside requests for information. Additionally, Agency employees who retain emails outside of the approved systems above risk violating Agency cyber security standards. Notably, bulk storage of email messages necessarily implicates Personally Identifiable Information (PII) and Sensitive Personally Identifiable Information (SPII). Where such information is held off-system, Agency cyber security policies require additional actions by the user. For emails with PII and SPII, users may be required to take special steps that include: (1) installing NLRB-approved encryption software, (2) acquiring Agency-owned portable media, and/or (3) retaining Supervisor approval.

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<sup>1</sup> For instructions on the Email Archive Library, see the Capstone Memo that issued May 1, 2017 (also on Sharepoint).

**The relevant language from the Capstone memo is reproduced below. Please see the attached memo for the full explanation of the new e-mail management policy.**

To the extent that users have particular emails they wish to retain as historical records, instructions from management will be distributed shortly regarding the criteria for determining which emails may be retained, as well as where those emails may be retained outside of the Agency's email system. *Other than these limited email records, "non-Capstone" custodians are instructed to not remove Agency email records from the Agency's email system prior to policy implementation. For example, saving Agency email records beyond those which meet the criteria for longer retention to an external location negates and circumvents the effect of the new email retention policies.* Non-compliance with the "Capstone" policy will require expanded searches by the Agency to fully respond to FOIA requests, Congressional inquiries, and matters in litigation, creating additional costs and legal risk. Non-compliance also exposes the Agency to legal liability and possible sanctions for failing to comply with the Agency's published email retention standards.

**The Administrative Policies and Procedures Manual -- Protection of Sensitive Agency Information (Effective 7/31/2007) is found here:**

[https://nlrb.sharepoint.com/DofA/APProcedures%20Manual/appm\\_it-4\\_protection\\_of\\_sensitive\\_information.pdf](https://nlrb.sharepoint.com/DofA/APProcedures%20Manual/appm_it-4_protection_of_sensitive_information.pdf)

**From:** [Ringler, Robert](#)  
**To:** [Aburvasamy, Prem](#)  
**Subject:** RE: Capstone policy question  
**Date:** Thursday, January 11, 2018 3:33:45 PM

---

Prem,

Thanks for the information.

Rob

---

**From:** Aburvasamy, Prem  
**Sent:** Thursday, January 11, 2018 12:51 PM  
**To:** Ringler, Robert <[Robert.Ringler@nrlb.gov](mailto:Robert.Ringler@nrlb.gov)>  
**Subject:** RE: Capstone policy question

Judge Ringler,

The agency email was migrated to Office365 sometime in 2010. So, all emails are stored in Office365 since 2010. The emails were not deleted by the agency and was managed by individuals. With the implementation of Capstone, agency is managing the emails for the individuals – meaning all emails older than 7 years will be deleted permanently and if the individual deletes any email from the “inbox” – it only gets deleted from the “inbox” and not from the email system. So, all emails are retained for 7 years and gets permanently gets deleted after 7 years. Prior to 2010 the emails were stored locally on individuals computer and was limited in size, when it was migrated to Office365 older emails if existed in the mailbox were migrated.

Hope this helps.

Thank you.  
Prem

---

**From:** Ringler, Robert  
**Sent:** Thursday, January 11, 2018 12:03 PM  
**To:** Aburvasamy, Prem <[Prem.Aburvasamy@nrlb.gov](mailto:Prem.Aburvasamy@nrlb.gov)>  
**Subject:** Capstone policy question

Prem,

Can you offer me any guidance on what the Agency’s email retention policy was before the Capstone retention policy was implemented?

Thanks,

Robert Ringler  
Administrative Law Judge

**From:** [Williams, Kenneth J.](#)  
**To:** [Hunter, Damon](#)  
**Subject:** Capstone Policy  
**Date:** Thursday, April 19, 2018 10:08:00 AM  
**Attachments:** [Capstone Reminder Memo Final 7-6-17.pdf](#)

---

Very Respectfully Kenneth Williams  
Records Officer  
National Labor Relations Board  
1015 Half Street, S.E. Suite 3071  
Washington, DC  
(202) 273-2833

**UNITED STATES GOVERNMENT**  
**National Labor Relations Board**  
**Office of the General Counsel**



**MEMORANDUM**

DATE: July 6, 2017

TO: All Employees

FROM: Prem Aburvasamy, Chief Information Officer  
Kenneth Williams, Records Officer  
David Gaston, Branch Chief, E-Litigation Branch

SUBJECT: Capstone Reminder Guidance – New Agency Email Retention Policies

This message is a reminder of the NLRB's data management practices following the June 1<sup>st</sup> implementation of the Capstone email retention policy. Specifically, this message is to remind all Agency employees that emails are to be retained in appropriate and identified Agency electronic systems that support records management and litigation requirements including the ability to identify, retrieve, and retain the records for as long as they are needed. The following electronic systems are approved for the management of e-mails: (1) Outlook, (2) NxGen, (3) offices' new Email Archive Libraries,<sup>1</sup> and (4) systems where emails are kept as official records (e.g., systems in use by Human Resources, Special Counsel, and the Inspector General).

Employees keeping Agency emails outside of these systems expose the Agency to risk. Unaccounted email *circumvents the effect of the Capstone email retention policy* and reduces the Agency's ability to accurately respond to outside requests for information. Additionally, Agency employees who retain emails outside of the approved systems above risk violating Agency cyber security standards. Notably, bulk storage of email messages necessarily implicates Personally Identifiable Information (PII) and Sensitive Personally Identifiable Information (SPII). Where such information is held off-system, Agency cyber security policies require additional actions by the user. For emails with PII and SPII, users may be required to take special steps that include: (1) installing NLRB-approved encryption software, (2) acquiring Agency-owned portable media, and/or (3) retaining Supervisor approval.

---

<sup>1</sup> For instructions on the Email Archive Library, see the Capstone Memo that issued May 1, 2017 (also on Sharepoint).

**The relevant language from the Capstone memo is reproduced below. Please see the attached memo for the full explanation of the new e-mail management policy.**

To the extent that users have particular emails they wish to retain as historical records, instructions from management will be distributed shortly regarding the criteria for determining which emails may be retained, as well as where those emails may be retained outside of the Agency's email system. *Other than these limited email records, "non-Capstone" custodians are instructed to not remove Agency email records from the Agency's email system prior to policy implementation. For example, saving Agency email records beyond those which meet the criteria for longer retention to an external location negates and circumvents the effect of the new email retention policies.* Non-compliance with the "Capstone" policy will require expanded searches by the Agency to fully respond to FOIA requests, Congressional inquiries, and matters in litigation, creating additional costs and legal risk. Non-compliance also exposes the Agency to legal liability and possible sanctions for failing to comply with the Agency's published email retention standards.

**The Administrative Policies and Procedures Manual -- Protection of Sensitive Agency Information (Effective 7/31/2007) is found here:**

[https://nlrb.sharepoint.com/DofA/APProcedures%20Manual/appm\\_it-4\\_protection\\_of\\_sensitive\\_information.pdf](https://nlrb.sharepoint.com/DofA/APProcedures%20Manual/appm_it-4_protection_of_sensitive_information.pdf)

**From:** [Williams, Kenneth J.](#)  
**To:** [Hunter, Damon](#)  
**Subject:** FW: Capstone memo  
**Date:** Monday, April 23, 2018 7:20:00 AM  
**Attachments:** [Capstone Instructions and attachment 5-1-17 \(003\).pdf](#)  
[Capstone memo to Agency employees \(3-31-17\).pdf](#)

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Please post these two additional memorandums on the Records Resource page in date order.

Respectfully Kenneth Williams  
Records Officer  
National Labor Relations Board  
1015 Half Street, S.E. Suite 3071  
Washington, DC  
(202) 273-2833

---

**From:** Platt, Nancy  
**Sent:** Friday, April 20, 2018 5:49 PM  
**To:** Williams, Kenneth J. <Kenneth.Williams@nrlrb.gov>  
**Subject:** Capstone memo

Ken,

I saw that you posted the July 6, 2017 Capstone memo on your Sharepoint page, under Records Resources. The attached two additional Capstone memos should also be posted. Thanks!

Nancy

*Nancy E. Kessler Platt*  
*Acting Associate General Counsel*  
*Division of Legal Counsel*  
*National Labor Relations Board*  
1015 Half Street, S.E. - Room 4019  
Washington, D.C. 20570  
(202) 273-2937  
[nancy.platt@nrlrb.gov](mailto:nancy.platt@nrlrb.gov)



UNITED STATES GOVERNMENT  
*National Labor Relations Board*



**Memorandum**

**Date:** May 1, 2017

**To:** All Employees

**From:** Prem Aburvasamy, Chief Information Officer  
Kenneth Williams, Records Officer  
David Gaston, Branch Chief, E-Litigation Branch

**Subject:** Further Guidance for New Agency Email Retention Policies –  
“Capstone” Approach

---

This Memorandum follows up on, and provides for further guidance to, the March 31, 2017 Memorandum, entitled “New Agency Email Retention Policies – ‘Capstone’ Approach”.

To comply with directives and guidance from the Office of Management and Budget (OMB) and the National Archives and Records Administration (NARA), the Agency is implementing a Capstone approach for managing Agency email records (see NARA Bulletin 2013-02 “Guidance on a New Approach to Managing Email Records”). Implementation is scheduled to begin on June 1, 2017. Under the Capstone approach, the Agency will manage email records based on the role of the email account user and/or office rather than on the content of each email record.

For Agency email account users not identified as Capstone custodians<sup>1</sup>, the Capstone approach will retain all emails for seven years. Email records older

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<sup>1</sup> Capstone custodians include the Chairman and Board members; Chief of Staff to the Chairman; the Solicitor; the Executive Secretary; Chief Counsels to Board Members; Chief Administrative Law Judge; Deputy Chief Administrative Law Judge; Director of the Office of Representation Appeals; Director of the Office of Congressional and Public Affairs; the Chief Information Officer; the General Counsel; the Deputy General Counsel; the Executive Assistant to the General Counsel; the Associate General Counsels of Operations-Management, Advice, Enforcement-Litigation, and Legal Counsel; Deputy Associate General Counsel of Enforcement-Litigation; Associate to the General Counsel of Operations-Management; the Chief Financial Officer; Director of Administration; the Designated Agency Ethics Official and the Inspector General.

than seven years will be deleted beginning June 1, 2017. Email records will be deleted perpetually and on a daily basis as the seven-year mark is reached.

To the extent that users have particular emails they wish to retain as historical records, these emails must be maintained outside the Agency’s enterprise email system. A SharePoint-based Email Archive Library is the designated repository for these email-based historical records. That Library will consist of three Folders labeled in SharePoint as Historical Value Case Matters, Institutional Processes–Knowledge, and Legal Research (see below for further explanation of the categories of emails).<sup>2</sup> Each Division and Branch will have its own Email Archive Library in which to upload these historical records. All historical records uploaded to the Email Archive Library will only be visible to members of that particular Division or Branch.<sup>3</sup>

To the extent that users wish to retain historical records, the recommended guidance for retention is as follows:

1. Legal Research
  - a. Documents containing information with significant legal research or reference value.
  - b. Documents containing general research unconnected to particular cases.
2. Historical Value Case Matters
  - a. Documents containing information with significant case reference value.
  - b. Documents that have sufficient historical or other value to warrant their continued preservation.
  - c. Documents showing how issues were handled in particular matters where it is foreseeable those issues may arise again.
3. Institutional Processes-Knowledge
  - a. Documents related to an office/branch's internal processes.
  - b. Documents showing how non-case matters are/were handled.

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<sup>2</sup> If an office wishes to rename these folders or create a small number of additional folders, please contact [sharepointhelp@nrlrb.gov](mailto:sharepointhelp@nrlrb.gov).

<sup>3</sup> For example, the “front office” of the Division of Legal Counsel and each Branch within that Division (the FOIA Branch, E-Litigation Branch, and Contempt, Compliance, and Special Litigation Branch) will have a designated Email Archive Library in which to upload historical email records. Historical records uploaded to a particular Email Archive Library will be visible only to the members within that Branch or office.

This guidance supplements, but does not modify, any obligation to upload emails to NxGen, JCMS, or any other Agency system (see OM 12-80 (revised), OM 13-23). The new email retention policies also do not modify any other obligations of an Agency employee to preserve emails for pending or anticipated litigation.

Instructions for uploading historical records to the Email Archive library are attached to this memo.

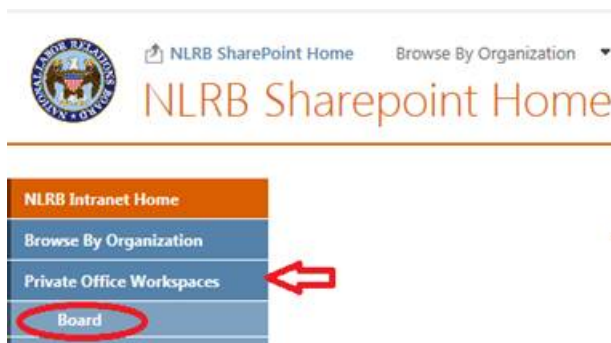
If you have any technical questions regarding Sharepoint, please contact [sharepointhelp@nlrb.gov](mailto:sharepointhelp@nlrb.gov). For other questions regarding Capstone policies, please feel free to contact the E-Litigation Branch ([david.gaston@nlrb.gov](mailto:david.gaston@nlrb.gov)) or the Division of Legal Counsel ([barbara.oneill@nlrb.gov](mailto:barbara.oneill@nlrb.gov)).

# Opening a SharePoint Library in Explorer View

The instructions that follow only work if you open SharePoint in Internet Explorer. Also, these instructions use the Division of Legal Counsel as representative, i.e., the SharePoint Home page for DLC.

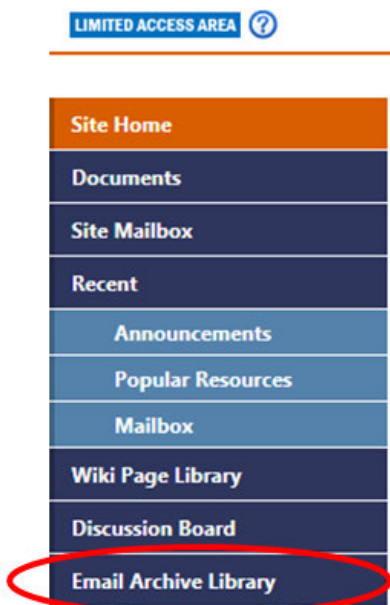
1. Open Internet Explorer and go to the NLRB Intranet site – <https://nlrb.sharepoint.com/SitePages/Home.aspx>
2. The Email Archive Libraries are found in each Office's respective **Private Office Workspace (POW)**. The POW is a site in SharePoint specifically designed for private collaboration between members of an office and will have information not open to all users of the NLRB Intranet.
  - a. You can access your Private Office Workspace from the NLRB SharePoint Intranet Home Page.
  - b. From the left side navigation, click the Private Office Workspace "drop down list" and select your respective Office.

Figure 1 Private Office Workspace



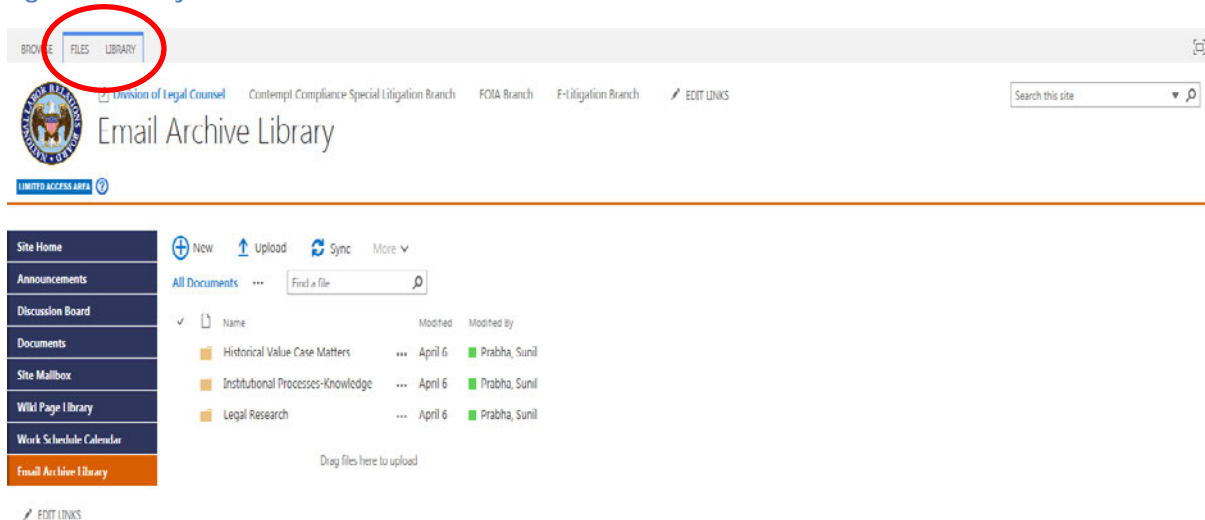
3. From the left navigation on your office's POW click Email Archive Library (Figure 2).

Figure 2. Email Archive Library



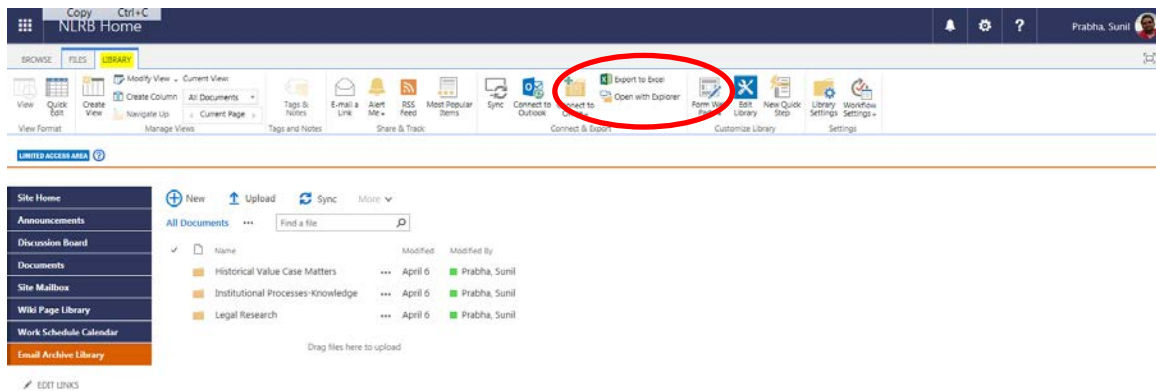
4. Select the '**Library**' tab located at the top left hand corner (see Figure 3. Library Tab).

Figure 3. Library Tab



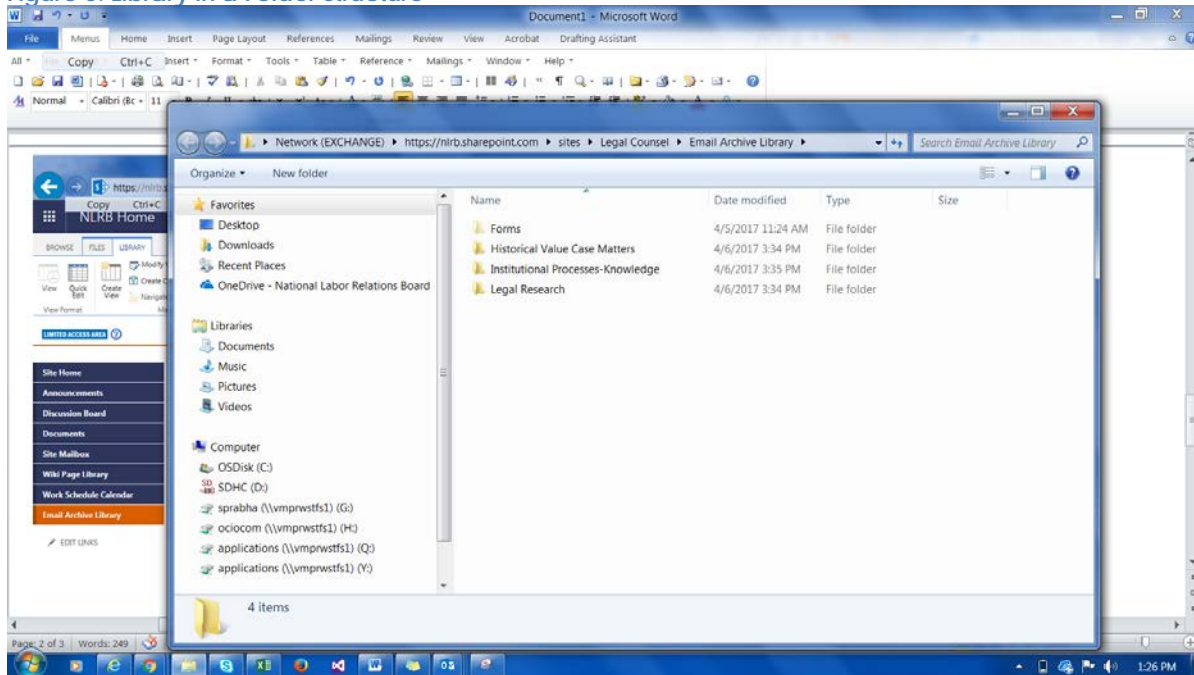
5. A list of additional options will appear in the toolbar/ribbon. In the toolbar/ribbon click the option **Open with Explorer** icon in the **Connect & Export** group (see Figure 4. Open in Explorer).

Figure 4. Open in Explorer



6. SharePoint will open the library in a network-type folder structure (Explorer View) that one may use to move the files in bulk, or manage the files and subfolders as if on one's local computer (see Figure 5. Library in a Folder Structure).

Figure 5. Library in a Folder Structure



You can now move your emails from Outlook into the three folders by dragging them over. If you make an error, i.e., you place an email in the wrong folder and/or you decide that you no longer wish to retain the email, you can delete that email from the folder. You may also drag/move emails between the folders.

UNITED STATES GOVERNMENT  
*National Labor Relations Board*



Memorandum

**Date:** March 31, 2017

**To:** All Employees

**From:** Prem Aburvasamy, Chief Information Officer  
Kenneth Williams, Records Officer  
David Gaston, Branch Chief, E-Litigation Branch

**Subject:** New Agency Email Retention Policies – “Capstone” Approach

---

To comply with directives and guidance from the Office of Management and Budget (OMB) and the National Archives and Records Administration (NARA), the Agency must implement new email retention policies. The new policies are the result of a Presidential Memorandum (“Managing Government Records”) signed by the President on November 28, 2011, and a subsequent August 24, 2012 directive issued by OMB and NARA (M-12-18, “Managing Government Records Directive”), which requires Executive Branch Agencies to “manage both permanent and temporary email records in accessible electronic format.”

To comply with this directive, the Agency is implementing a “Capstone” approach for managing Agency email records, based on NARA guidance (NARA Bulletin 2013-02 “Guidance on a New Approach to Managing Email Records”). Implementation is scheduled to begin on June 1, 2017. Under the “Capstone” approach, the Agency will manage email records based on the role of the email account user and/or office rather than on the content of each email record.

Email records will be captured and managed according to user role using the following retention approach:

- a. **Email Records from Email Accounts of Designated “Capstone” Officials:** The email records from the email accounts of certain “policy makers” whose role within the Agency predominantly creates permanent records will be retained permanently. These “Capstone” Officials include the Chairman and Board members; Chief of Staff to the Chairman; the Solicitor; the Executive Secretary; Chief Counsels to Board Members; the Chief Information Officer; the General Counsel; the Deputy General Counsel; the Executive Assistant to the General Counsel; the Associate

General Counsels of Operations-Management, Advice, Enforcement-Litigation, and Legal Counsel; Associate to the General Counsel of Operations-Management; the Chief Financial Officer; and the Director of Administration.

b. **Email Records from Email Accounts of Users Not Designated as Capstone Officials:** For all other Agency email account users, identified as “non-Capstone” custodians, the “Capstone” approach will retain **all** emails for seven years. **Email records older than seven years will be deleted beginning June 1, 2017.** Email records will be deleted perpetually and on a daily basis as the seven-year mark is reached.

To the extent that users have particular emails they wish to retain as historical records, instructions from management will be distributed shortly regarding the criteria for determining which emails may be retained, as well as where those emails may be retained outside of the Agency’s email system. Other than these limited email records, “non-Capstone” custodians are instructed to not remove Agency email records from the Agency’s email system prior to policy implementation. For example, saving Agency email records beyond those which meet the criteria for longer retention to an external location negates and circumvents the effect of the new email retention policies. Non-compliance with the “Capstone” policy will require expanded searches by the Agency to fully respond to FOIA requests, Congressional inquiries, and matters in litigation, creating additional costs and legal risk. Non-compliance also exposes the Agency to legal liability and possible sanctions for failing to comply with the Agency’s published email retention standards.

These changes do not modify any obligations to upload emails to NxGen pursuant to Agency policies on that system (*see* OM 12-80 (revised), OM 13-23). The new email retention policies also do not modify records stored in NxGen, litigation holds, or any other obligations of an Agency employee to preserve emails for pending or anticipated litigation.



**From:** [Williams, Kenneth J.](#)  
**To:** [Goldstein, Dawn](#)  
**Cc:** [Gaston, David](#); [Platt, Nancy](#); [Warren, Tremell](#)  
**Subject:** RE: using personal email for work purposes  
**Date:** Wednesday, June 20, 2018 1:30:00 PM  
**Attachments:** [Capstone Reminder Memo Final 7-6-17.pdf](#)

---

You welcome Ma'am.

In addition to what David cited, the attached Capstone Memo is the Agencies policy that requires employees to retain them in agency specific recordkeeping systems.

Very Respectfully Kenneth Williams  
Records Officer  
National Labor Relations Board  
1015 Half Street, S.E. Suite 3071  
Washington, DC  
(202) 273-2833

---

**From:** Goldstein, Dawn  
**Sent:** Wednesday, June 20, 2018 1:26 PM  
**To:** Williams, Kenneth J. <[Kenneth.Williams@nlr.gov](mailto:Kenneth.Williams@nlr.gov)>  
**Cc:** Gaston, David <[David.Gaston@nlr.gov](mailto:David.Gaston@nlr.gov)>; Platt, Nancy <[Nancy.Platt@nlr.gov](mailto:Nancy.Platt@nlr.gov)>  
**Subject:** FW: using personal email for work purposes

Thanks anyway, Ken, David sent me the cite below. Thanks all!

---

**From:** Gaston, David  
**Sent:** Wednesday, June 20, 2018 1:19 PM  
**To:** Goldstein, Dawn <[Dawn.Goldstein@nlr.gov](mailto:Dawn.Goldstein@nlr.gov)>; Platt, Nancy <[Nancy.Platt@nlr.gov](mailto:Nancy.Platt@nlr.gov)>  
**Subject:** RE: using personal email for work purposes

Original: <https://www.archives.gov/records-mgmt/bulletins/2015/2015-02.html>

Also cited more recently at: <https://www.archives.gov/records-mgmt/bulletins/2017/2017-01.html>

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**From:** Goldstein, Dawn  
**Sent:** Wednesday, June 20, 2018 12:58 PM  
**To:** Williams, Kenneth J. <[Kenneth.Williams@nlr.gov](mailto:Kenneth.Williams@nlr.gov)>  
**Cc:** Platt, Nancy <[Nancy.Platt@nlr.gov](mailto:Nancy.Platt@nlr.gov)>; Owens, Dean <[Dean.Owens@nlr.gov](mailto:Dean.Owens@nlr.gov)>  
**Subject:** using personal email for work purposes

Hi Ken,

Nancy told me that you found a memo explaining federal employees' obligation to not use personal email for work purposes. Can you please refer me to that memo?

Thanks so much!

Dawn

Dawn L. Goldstein  
Deputy Assistant General Counsel  
Contempt, Compliance, and Special Litigation Branch  
National Labor Relations Board  
1015 Half Street, S.E.  
Fourth Floor  
Washington, D.C. 20570  
p-202-273-2936  
[Dawn.Goldstein@nrlb.gov](mailto:Dawn.Goldstein@nrlb.gov)

**From:** [Maybin, Eugenia](#)  
**To:** [Williams, Kenneth J.](#)  
**Subject:** RE: Agency Email APPM  
**Date:** Monday, March 4, 2019 3:35:30 PM  
**Attachments:** [RM -Agency Email Records Retention Policy EMM.pdf](#)

---

Please see attached.

---


**From:** Williams, Kenneth J.  
**Sent:** Monday, March 4, 2019 8:09 AM  
**To:** Maybin, Eugenia <Eugenia.Maybin@nlrb.gov>  
**Subject:** Agency Email APPM

Ms. Maybin,

Please go to subject policy and format for final review. Thanks in advance

[https://nlrb.sharepoint.com/:w:/s/OCIO/IA/EXsaF94iLZdGtLLA1XUPu94BmKdXlryZPUeaI\\_1gF4KArg](https://nlrb.sharepoint.com/:w:/s/OCIO/IA/EXsaF94iLZdGtLLA1XUPu94BmKdXlryZPUeaI_1gF4KArg)

Very Respectfully Kenneth Williams  
Records Officer  
National Labor Relations Board  
1015 Half Street, S.E. Suite 3071  
Washington, DC  
(202) 273-2833

 <p style="text-align: center;"><b>NATIONAL LABOR RELATIONS BOARD</b></p> <p style="text-align: center;"><b>ADMINISTRATIVE POLICIES AND PROCEDURES MANUAL</b></p>	<p><b>CHAPTER:</b></p> <p style="text-align: center;"><b>REC-5</b></p> <p><b>EFFECTIVE DATE</b> March 4, 2019</p>	<p><b>REVISED DATE</b> March 4, 2019</p>
<p><b>AGENCY E-MAIL RECORDS RETENTION POLICY</b></p>		

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1. **SUPERSEDED MATERIAL.** This chapter is second issuance of the Agency E-Mail Records Retention Policy in the Administrative Policy and Procedures Manual and supersedes Administrative Bulletin AB 97-28 issued March 19, 1997.
2. **PURPOSE:** The following e-mail policy has been prepared for Agency use in response to National Archives and Records Administration regulations on e-mail, Federal Register, Vol. 60, No. 166, August 28, 1995, Rules and Regulations, p. 44634-44642. The intention of this guidance is not to require the preservation of every e-mail message. Its purpose is to direct the preservation of those messages that contain information that is necessary to ensure that Board policies, programs, and activities are adequately documented. E-mail message creators and recipients must decide whether a particular message is appropriate for preservation. In making these decisions, all personnel should use the same judgment they use when determining whether to retain and file paper records.
3. **AUTHORITY AND PRINCIPLES GOVERNING E-MAIL COMMUNICATIONS:**  
All Government employees and contractors are required by law to make and preserve adequate and proper documentation of the organization, functions, policies, decisions, procedures, and essential transactions of the Agency (Federal Records Act (FRA), 44 U.S.C. 3101 et seq.). In addition, Federal regulations govern the life cycle of these records: they must be properly stored and preserved, available for retrieval, and subject to approved

disposition schedules. An important modern improvement is the ease of communications being afforded by the use of e-mail. Employees are encouraged to use e-mail because it is a cost-effective communications tool. All employees must be aware that some types of messages being exchanged on e-mail are important to the Agency and must be preserved; such messages are considered Federal records under the law. The following guidance is designed to help employees determine which of their e-mail messages must be preserved as Federal records and which may be deleted without further authorization because they are not Federal record materials.

#### **4. E-MAIL MESSAGES AS FEDERAL RECORDS:**

##### **a. Which E-Mail Messages Are Records:**

- (1) E-mail messages are records when they meet the definition of records in the Federal Records Act. The definition states that documentary materials are Federal records when they: are made or received by an agency under Federal law or in connection with public business; and are preserved or appropriate for preservation as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the Government, or because of the informational value in them.
- (2) Under FRA regulations (36 CFR 1222.38), principle categories of materials, including e-mail, that are to be preserved are:
  - a. records that document the formulation and execution of basic policies and decisions and the taking of necessary actions;
  - b. records that document important meetings;
  - c. records that facilitate actions by agency officials and their successors in office;
  - d. records that make possible a proper scrutiny by Congress or other duly authorized agencies of the Government; and
  - e. records that protect the financial, legal, and other rights of the Government and of persons directly affected by the Government's actions.
- (3) For example, just like paper records, e-mail messages that may constitute Federal records include:
  - a. e-mail providing key substantive comments on a draft action memorandum, if the e-mail message adds to a proper understanding of Agency action;

- b. e-mail providing documentation of significant Agency decisions and commitments reached orally (person to person, by telecommunications, or in conference) and not otherwise documented in Board files;
  - c. e-mail conveying information of value on important Board activities, e.g., program files, case information, and Agency directives.
- 5. CAPSTONE: To comply with directives and guidance from the Office of Management and Budget (OMB) and the National Archives and Records Administration (NARA), the Agency must implement new email retention policies. The new policies are the result of a Presidential Memorandum (“Managing Government Records”) signed by the President on November 28, 2011, and a subsequent August 24, 2012 directive issued by OMB and NARA (M-12-18, “Managing Government Records Directive”), which requires Executive Branch Agencies to “manage both permanent and temporary email records in accessible electronic format.”

To comply with this directive, the Agency is implementing a “Capstone” approach for managing Agency email records, based on NARA guidance (NARA Bulletin 2013-02 “Guidance on a New Approach to Managing Email Records”). Implementation is scheduled to begin on June 1, 2017. Under the “Capstone” approach, the Agency will manage email records based on the role of the email account user and/or office rather than on the content of each email record.

Email records will be captured and managed according to user role using the following retention approach:

- a. Email Records from Email Accounts of Designated “Capstone” Officials: The email records from the email accounts of certain “policy makers” whose role within the Agency predominantly creates permanent records will be retained permanently. These “Capstone” Officials include the Chairman and Board members; Chief of Staff to the Chairman; the Solicitor; the Executive Secretary; Chief Counsels to Board Members; the Chief Information Officer; the General Counsel; the Deputy General Counsel; the Executive Assistant to the General Counsel; the Associate

New Agency Email Retention Policies – “Capstone” Approach March 29, 2017 Page 2  
General Counsels of Operations-Management, Advice, Enforcement-Litigation, and Legal Counsel; Associate to the General Counsel of Operations-Management; the Chief Financial Officer; and the Director of Administration.

- b. Email Records from Email Accounts of Users Not Designated as Capstone Officials: For all other Agency email account users, identified as “non-Capstone” custodians, the “Capstone” approach will retain all emails for seven years. Email records older than seven years will be deleted beginning June 1, 2017. Email records will be deleted perpetually and on a daily basis as the seven-year mark is reached.

To the extent that users have particular emails they wish to retain as historical records, instructions from management will be distributed shortly regarding the criteria for determining which emails may be retained, as well as where those emails may be retained outside of the Agency’s email system. Other than these limited email records, “non-

Capstone” custodians are instructed to not remove Agency email records from the Agency’s email system prior to policy implementation. For example, saving Agency email records beyond those which meet the criteria for longer retention to an external location negates and circumvents the effect of the new email retention policies. Non-compliance with the “Capstone” policy will require expanded searches by the Agency to fully respond to FOIA requests, Congressional inquiries, and matters in litigation, creating additional costs and legal risk. Non-compliance also exposes the Agency to legal liability and possible sanctions for failing to comply with the Agency’s published email retention standards.

These changes do not modify any obligations to upload emails to NxGen pursuant to Agency policies on that system (see OM 12-80 (revised), OM 13-23). The new email retention policies also do not modify records stored in NxGen, litigation holds, or any other obligations of an Agency employee to preserve emails for pending or anticipated litigation.

6. **HOW TO PRESERVE E-MAIL RECORDS:** For those e-mail messages and attachments that meet the statutory definition of records, it is essential to ensure that the record documentation includes the e-mail message itself, any attachments, and the essential transmission data (who sent the message, the addressees and any other recipients, and when it was sent -- the current e-mail “header” information is adequate).
7. **RECORDS MANAGEMENT REVIEW:** The Agency’s Records Management Section conducts periodic reviews of the records management practices at both Headquarters and in the Regions. These reviews ensure proper records creation, maintenance, and disposition by the NLRB. These periodic reviews will now include monitoring the implementation of the Agency’s e-mail record retention policy. This chapter of the Administrative Policy and Procedures Manual addresses only retention of Agency records and does not affect any other Agency e-mail or Internet use policies.
8. **INSTRUCTIONS:**
  - a. E-mail is an internal Agency work-related resource used for the accomplishment of the work/mission of the Agency and users need to exercise the same good judgment, common sense, and sensitivity in the use of e-mail as they do with Agency telephones, faxes, and copying machines. Occasional personal use of the e-mail is permitted.
  - b. Agency information in the e-mail system is neither private nor confidential. The Agency will not monitor the NLRBU’s and/or the NLRBPA’s e-mail messages.
  - c. Messages that are not records may be deleted when no longer needed.
  - d. Certain e-mail messages that are not Federal records may still be subject to pending requests and demands under the Freedom of Information Act, the Privacy Act, and litigation and court orders, and should be retained in accordance with the NLRB records and retention schedules and the Capstone policy. When e-mail is retained as a record, the period of its retention is governed by NLRB records retention schedules, described in the NLRB Files Maintenance and Records Disposition Handbook, and individual office file plans which have been prepared for all Headquarters and Regional offices. Under these schedules, records are kept for defined periods of time pending destruction or transfer to the National Archives. Originally electronic bulletin boards

were established for the posting of official notices; however, SharePoint is more widely used for this purpose and is the preferred medium for disseminating policy and other Agency-related information. In addition, employees may use individual addresses to send messages and are also encouraged to use private mailing lists to send messages to a wider audience

- e. Before deleting any e-mail message, apply the guidelines above to determine if it meets the legal definition of a record and if so, print it.
- f. Be certain the printed message kept as a record contains essential transmission and receipt data; if not, print the data or annotate the printed copy.
- g. File the printed messages and essential transmission and receipt data (header information) with related files of the office.

9. **FUTURE TECHNOLOGY:** This chapter may be subject to change considering future applicable rules and regulations promulgated by the National Archives and Records Administration, and any changes in the NLRB's recordkeeping systems.

- a. Originally electronic bulletin boards were established for the posting of official notices; however, SharePoint is now used for this purpose and is the preferred medium for disseminating policy and other Agency-related information. In addition, employees may use individual addresses to send messages and are also encouraged to use private mailing lists to send messages to a wider audience
- b. Before deleting any e-mail message, apply the guidelines above to determine if it meets the legal definition of a record and if so, print it.
- c. Be certain the printed message kept as a record contains essential transmission and receipt data; if not, print the data or annotate the printed copy.
- d. File the printed messages and essential transmission and receipt data (header information) with related files of the office.

10. **FUTURE TECHNOLOGY:**

This chapter may be subject to change considering future applicable rules and regulations promulgated by the National Archives and Records Administration, and any changes in the NLRB's recordkeeping systems.



**From:** [Nelson, Octavia R.](#)  
**To:** [Williams, Kenneth J.](#); [Maybin, Eugenia](#)  
**Subject:** FW: Records Management Information  
**Date:** Monday, April 8, 2019 2:05:52 PM  
**Attachments:** [Records Managment Information.docx](#)

---

Hi. Thanks for allowing us to review. Please let me know if I need to reference this or other document in the COOP Plan.

Octavia Nelson  
Emergency Management Specialist  
Continuity Manager  
National Labor Relations Board  
202.273.1817 (W)  
202.793.0752 (M)

*The Security Branch requests your feedback on the service you received, please do so by completing the survey available via this [link](#)*

---

**From:** Williams, Harold  
**Sent:** Monday, April 8, 2019 1:24 PM  
**To:** Nelson, Octavia R. <Octavia.Nelson@nlrb.gov>  
**Subject:** RE: Records Management Information

Hi Octavia,  
It looks fine.

Harold

---

**From:** Nelson, Octavia R.  
**Sent:** Monday, April 8, 2019 9:09 AM  
**To:** Williams, Harold <[Harold.Williams@nlrb.gov](mailto:Harold.Williams@nlrb.gov)>  
**Subject:** FW: Records Management Information

Good morning,

Please review and provide comment.

Thanks

Octavia Nelson  
Emergency Management Specialist  
Continuity Manager  
National Labor Relations Board  
202.273.1817 (W)  
202.793.0752 (M)

*The Security Branch requests your feedback on the service you received, please do so by completing the survey available via this [link](#)*

---

**From:** Williams, Kenneth J.

**Sent:** Friday, April 5, 2019 2:59 PM

**To:** Nelson, Octavia R. <[Octavia.Nelson@nlrb.gov](mailto:Octavia.Nelson@nlrb.gov)>

**Cc:** Maybin, Eugenia <[Eugenia.Maybin@nlrb.gov](mailto:Eugenia.Maybin@nlrb.gov)>

**Subject:** Records Management Information

Mrs. Nelson/Ms. Maybin,

I have created the attached Records Management Information document for possible dissemination, however, before I attempt to do so, can you review the content that relates to COOP is correct. Thanks in advance.

Respectfully,

Kenneth J. Williams

Records Officer

OCIO, National Labor Relations Board

1015 Half Street S.E. Suite 3071

Washington, DC 20570

(202)273-2833

# \*\*\*\*\* This is an informative message from the Chief Information Management Office of Information Assurance (Records Management Division) \*\*\*\*\*

## **What is a Record?**

Records are machine – readable materials records “s, or other documentary materials, regardless of physical form or characteristics, made or received by an agency of the U.S. Government under Federal law or in connection with the transaction of public business and preserved or appropriated for preservation by that agency, and its legitimate successor, as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities. Some specific examples of records are:

- NLRB Publication Master files (official copy of NLRB technical reports, booklets, pamphlets (See NLRB Records Disposition Standards, Appendix I, Chapter 3, for more information);
- NLRB Still Pictures (Slide sets, filmstrips, posters, or other pictorial evidence of the originations functions polices and or procedures (NLRB Records Disposition Standards, Appendix I, Chapter 3);
- Emergency Operations Test Files (Reports reflecting Agency wide test conducted under emergency plans (NLRB Records Disposition Standards, Appendix I, Chapter 3)

Records can be defined as Permanent or Non-Records/Transitory Material. The above-mentioned records are permanent records. An example of a Non-Record/Transitory Material would be papers of a temporary nature that do not have documentary or evidential value. An example would be drafts, notes, extra copy and convenience files. A Form NLRB-4977, Records Disposition Notice shall be prepared for Non-Records/Transitory Material and NLRB Records that have met their retention schedules as defined in NLRB Records Disposition Standards, Appendix I and forwarded to the Records Officer for review and signature prior to disposal.

<https://nlrb.sharepoint.com/IT/RecordsManagement/Documents/Records%20APPM%203.26.19/APPM-REC%202B.pdf>

## **Removal and Maintenance of Records:**

The policies and procedures related to the removal of documentary materials by employees from the custody of the National Labor Relations Board is outlined in the Administrative Policies and Procedures (REC-3). The following types of documentary materials may **NEVER** be removed:

- Any NLRB Record
- An only copy of any documentary materials involved in the conduct of the affairs of the Agency, whether judged to be records (including any copy that is unique, for example because it contains the signature or initials of the writer, reviewers, and/or concurring parties
- Portions of documentary materials (whether judged to be records) that constitute information subject to the Privacy Act of 1974, 5 U.S.C. 552a;
- Any NLRB internal decision-making records, whether the record copy or duplicate copies of records, which would be denied to the public under the Freedom of Information Act, including such documents as screens, certiorari, internal memoranda, or other internal documents

It is imperative that prior permission is requested under APPM Chapter REC-3 to retain copies employee work products during your tenure at the Agency before departing with any material. Please note that the OCIO/Information Assurance and the Chief Information Officer (OCIO) when notified by the NLRB Records Officer or other appropriate Agency official, is required to notify the Archivist of the United States of any actual, impending, or threatened unlawful removal, defacing, alteration, or destruction of Federal records in the custody of the Agency.

<https://nlrb.sharepoint.com/IT/RecordsManagement/Documents/Records%20APPM%203.26.19/APP M-REC-3.pdf>

### **Capstone/Agency E-Mail Records Retention Policy**

Capstone is the email records from the email accounts of certain “policy makers” whose role within the Agency predominantly creates permanent records will be retained permanently. These “Capstone” Officials include the Chairman and Board members; Chief of Staff to the Chairman; the Solicitor; the Executive Secretary; Chief Counsels to Board Members; the Chief Information Officer; the General Counsel; the Deputy General Counsel; the Executive Assistant to the General Counsel; the Associate General Counsels of Operations-Management, Advice, Enforcement-Litigation, and Legal Counsel; Associate to the General Counsel of Operations-Management; the Chief Financial Officer; and the Director of Administration.

**Why the Capstone approach to managing Email?** To comply with NARA Bulletin 2013-02 “Guidance on a New Approach to Managing Email Records”, the Agency has implemented “Capstone” for managing Agency email records. Under the “Capstone” approach, the Agency is managing email records based on the role of the email account user and/or office rather than on the content of each email record.

### **Which E-Mails are considered Records?**

- Records that document the formulation and execution of basic policies and decisions and the taking of necessary actions;
- Records that document important meetings;
- Records that make possible a proper scrutiny by Congress or other duly authorized agencies of the Government; and
- E-mail providing key substantive comments on a draft action memorandum, if the e-mail message adds to a proper understanding of Agency action;

<https://nlrb.sharepoint.com/IT/RecordsManagement/Documents/Records%20APPM%203.26.19/APP M-REC-5.pdf>

### **What are Essential (Vital) Records?**

Essential Records formally known as Vital Records refers to the identification, protection and ready availability of electronic and paper documents, references, records, information systems, data management software and equipment needed to support essential functions. The HQ records officer, with the assistance of all directorates, will conduct an essential records review annually, and provide updates to incorporate into the overall continuity program. The goal is to identify and protect records that stipulate how the NLRB will function in an emergency or disaster; classifying records necessary for the NLRB to continue operations, and identifying records needed to protect the legal and

financial rights of the government and citizens. The following are a few examples of NLRB Essential Records:

- Pay Roll
- Contracts
- Memorandums of Agreement/Understandings
- Case Records
- Appeals
- Speech Files
- Collective Bargaining Agreements

#### **What's needed for an effective Essential Records Program?**

- Assistance from Regional Records Liaisons Officer during the annual continuity plan revision (HQ COOP Plan, Annex I, figure 30);
- Notify appropriate personnel and the Records Officer immediately when an emergency or hazard has the potential to, or clearly has impacted essential records
- During a disaster or emergency, assess damage to records and take steps to stabilize effected records; and
- Work with the Records Officer and Continuity Manager to develop and implement protective measures to mitigate potential records disasters;

For more information see the NLRB's Essential Records policy at <https://nlrb.sharepoint.com/IT/RecordsManagement/Pages/RecordsResources.aspx> or contact the Records Officer at [kenneth.williams@nlrb.gov](mailto:kenneth.williams@nlrb.gov).

**From:** [Martin, Andrew](#)  
**To:** [Williams, Kenneth J.](#)  
**Subject:** Records Feature for All Aboard  
**Date:** Thursday, September 26, 2019 11:59:59 AM  
**Attachments:** [Records feature.pdf](#)  
[image001.png](#)

---

Any last minute edits?



Andrew Martin  
Chief Librarian  
National Labor Relations Board  
1015 Half Street SE  
Washington, DC 20570  
(202) 273-3724 (202) 273-2906 fax  
[andrew.martin@nlrb.gov](mailto:andrew.martin@nlrb.gov)

# You Spin Me Right Round Baby... Oh wait, not that kind of Record

Did you know that the Agency has a whole department whose only job is to deal with Records? Yup! They're part of OCIO, specifically the Information Assurance Division, and are headed by the indefatigable **Kenneth Williams**. This article will clarify some of the questions about what constitutes a Record, what the Records Management Section does, and what YOU need to do with all your old stuff.

## So. What Is A Record. Exactly?

Records are machine – readable materials records, or other documentary materials, regardless of physical form or characteristics, made or received by an agency of the U.S. Government under Federal law or in connection with the transaction of public business and preserved or appropriated for preservation by that agency, and its legitimate successor, as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities.

(PHEW! Don't worry, this won't be on the test)

Some specific examples of records are:

- NLRB Publication Master files (official copy of NLRB technical reports, booklets, pamphlets (See NLRB Records Disposition Standards, Appendix I, Chapter 3, for more information);
- NLRB Still Pictures (Slide sets, filmstrips, posters, or other pictorial evidence of the originations functions policies and or procedures (NLRB Records Disposition Standards, Appendix I, Chapter 3);
- Emergency Operations Test Files (Reports reflecting Agency wide test conducted under emergency plans (NLRB Records Disposition Standards, Appendix I, Chapter 3)

Records can be defined as Permanent or Non-Records/Transitory Material. The above-mentioned records are permanent records. An example of a Non-Record/Transitory Material would be papers of a temporary nature that do not have documentary or evidential value. An example would be drafts, notes, extra copy and convenience files. A Form NLRB-

4977, Records Disposition Notice shall be prepared for Non-Records/Transitory Material and NLRB Records that have met their retention schedules as defined in NLRB Records Disposition Standards, Appendix I and forwarded to the Records Officer for review and signature prior to disposal.

<https://nlrb.sharepoint.com/IT/RecordsManagement/Documents/Records%20APPM%203.26.19/APPM-REC%202B.pdf>

## Removal and Maintenance of Records:

The policies and procedures related to the removal of documentary materials by employees from the custody of the National Labor Relations Board is outlined in the Administrative Policies and Procedures (REC-3). The following types of documentary materials may **NEVER** be removed:

- Any NLRB Record
- An only copy of any documentary materials involved in the conduct of the affairs of the Agency, whether judged to be records (including any copy that is unique, for example because it contains the signature or initials of the writer, reviewers, and/or concurring parties.
- Portions of documentary materials (whether judged to be records) that constitute information subject to the Privacy Act of 1974, 5 U.S.C. 552a;
- Any NLRB internal decision-making records, whether the record copy or duplicate copies of records, which would be denied to the public under the Freedom of Information Act, including such documents as screens, certiorari, internal memoranda, or other internal documents

It is imperative that prior permission is requested under APPM Chapter REC-3 to retain copies employee work products during your tenure at the Agency before departing with any material. Please note that the OCIO/Information Assurance and the Chief Information Officer (OCIO) when notified by the NLRB Records Officer or other appropriate Agency official, is required to notify the Archivist of the United States of any actual, impending, or threatened unlawful re-

Continued on page 17



moval, defacing, alteration, or destruction of Federal records in the custody of the Agency.

<https://nlrb.sharepoint.com/IT/RecordsManagement/Documents/Records%20APPM%203.26.19/APPM-REC-3.pdf>

### **Capstone/Agency E-Mail Records Retention Policy**

Capstone is the email records from the email accounts of certain “policy makers” whose role within the Agency predominantly creates permanent records will be retained permanently. These “Capstone” Officials include the Chairman and Board members; Chief of Staff to the Chairman; the Solicitor; the Executive Secretary; Chief Counsels to Board Members; the Chief Information Officer; the General Counsel; the Deputy General Counsel; the Executive Assistant to the General Counsel; the Associate General Counsels of Operations-Management, Advice, Enforcement-Litigation, and Legal Counsel; Associate to the General Counsel of Operations-Management; the Chief Financial Officer; and the Director of Administration.

### **Why the Capstone approach to managing Email?**

To comply with NARA Bulletin 2013-02 “Guidance on a New Approach to Managing Email Records”, the Agency has implemented “Capstone” for managing Agency email records. Under the “Capstone” approach, the Agency is managing email records based on the role of the email account user and/or office rather than on the content of each email record.

### **Which E-Mails are considered Records?**

Records that document the formulation and execution of basic policies and decisions and the taking of necessary actions;

Records that document important meetings;

Records that make possible a proper scrutiny by Congress or other duly authorized agencies of the Government; and

E-mail providing key substantive comments on a draft action memorandum, if the e-mail message adds to a proper understanding of Agency action;

<https://nlrb.sharepoint.com/IT/RecordsManagement/Documents/Records%20APPM%203.26.19/APPM-REC-5.pdf>

### **What are Essential (Vital) Records?**

Essential Records formally known as Vital Records refers to the identification, protection and ready availability of electronic and paper documents, references, records, information systems, data management software and equipment needed to support essential functions. The HQ records officer, with the assistance of all directorates, will conduct an essential record review annually, and provide updates to incorporate into the overall continuity program. The goal is to identify and protect records that stipulate how the NLRB will function in an emergency or disaster; classifying records necessary for the NLRB to continue operations, and identifying records needed to protect the legal and financial rights of the government and citizens. The following are a few examples of NLRB Essential Records:

- Pay Roll
- Contracts
- Memorandums of Agreement/Understandings
- Case Records
- Appeals
- Speech Files
- Collective Bargaining Agreements

### **What’s needed for an effective Essential Records Program?**

- Assistance from Regional Records Liaisons Officer during the annual continuity plan revision (HQ COOP Plan, Annex I, figure 30);
- Notify appropriate personnel and the Records Officer immediately when an emergency or hazard has the potential to, or clearly has impacted essential records
- During a disaster or emergency, assess damage to records and take steps to stabilize effected records; and
- Work with the Records Officer and Continuity Manager to develop and implement protective measures to mitigate potential records disasters;

For more information see the NLRB’s Essential Records policy at <https://nlrb.sharepoint.com/IT/RecordsManagement/Pages/RecordsResources.aspx> or contact the Records Officer at [kenneth.williams@nlrb.gov](mailto:kenneth.williams@nlrb.gov). ‡



**From:** [Williams, Kenneth J.](#)  
**To:** [Platt, Nancy](#)  
**Subject:** Draft Retention Schedule for IG Investigation Files (003)  
**Date:** Thursday, December 17, 2020 9:48:00 AM  
**Attachments:** [Draft Retention Schedule for IG Investigation Files \(003\).docx](#)

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Forwarded, as requested.

Very Respectfully,

Kenneth J. Williams  
Records Officer  
OCIO, National Labor Relations Board  
1015 Half Street S.E. Suite 3071  
Washington, DC 20570  
(202)273-2833

**From:** [Aburvasamy, Prem](#)  
**To:** [Mira, Robert](#); [Marks, Eric](#); [Daniel, Sharon](#)  
**Cc:** [Troutman, Richard D.](#)  
**Subject:** RE: Updating list of Capstone Officials  
**Date:** Thursday, February 11, 2021 4:08:00 PM

---

We may have to review the Capstone policy and edit the Positions. Thanks.

---

**From:** Mira, Robert <Robert.Mira@nlrb.gov>  
**Sent:** Thursday, February 11, 2021 4:01 PM  
**To:** Aburvasamy, Prem <Prem.Aburvasamy@nlrb.gov>; Marks, Eric <Eric.marks@nlrb.gov>; Daniel, Sharon <Sharon.Daniel@nlrb.gov>  
**Cc:** Troutman, Richard D. <Richard.Troutman@nlrb.gov>  
**Subject:** Updating list of Capstone Officials

I'm reviewing and updating the Capstone Officials list for email retention and I need your help to identify the proper names.

Can you give me the names for the users in the following positions which should be Capstone Officials as of today?

**Executive Assistant to the General Counsel; - Vacant**

**Director of the Office of Congressional and Public Affairs; - Edwin Egee (was the director) Now vacant**

**Associate to the General Counsel of Operations-Management – Beth Tursell**

**Associate General Counsels of Operations-Management, - not sure if this position exists now.**

Thanks

Robert Mira  
NLRB Email Manager  
202-273-0201  
[rmira@nlrb.gov](mailto:rmira@nlrb.gov)

**From:** [Mira, Robert](#)  
**To:** [Aburvasamy, Prem](#); [Marks, Eric](#); [Daniel, Sharon](#); [Williams, Kenneth J.](#)  
**Cc:** [Troutman, Richard D.](#)  
**Subject:** RE: Updating list of Capstone Officials  
**Date:** Friday, February 12, 2021 12:50:33 PM

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Adding [@Williams, Kenneth J.](#) to the thread for awareness in case there are further changes.

The existing Capstone information:

<https://nlrb.sharepoint.com/IT/RecordsManagement/SitePages/Email%20Retention%20Policies%20-%20Capstone%20Approach.aspx>

The accounts of certain "policy makers" whose role within the Agency predominantly results in the creation of permanent records will be designated as Capstone Officials and their email retained permanently. These Capstone Officials include: the Chairman and Board Members; Chief of Staff to the Chairman; the Solicitor; the Executive Secretary; Chief Counsels to Board Members; Chief Administrative Law Judge; Deputy Chief Administrative Law Judge; Director of the Office of Representation Appeals; Director of the Office of Congressional and Public Affairs; the Chief Information Officer; the General Counsel; the Deputy General Counsel; the Executive Assistant to the General Counsel; the Associate General Counsels of Operations-Management, Advice, Enforcement-Litigation, and Legal Counsel; Deputy Associate General Counsel of Enforcement-Litigation; Associate to the General Counsel of Operations-Management; the Chief Financial Officer; the Inspector General; the Director of Administration; and the Designated Agency Ethics Official.

Robert Mira  
NLRB Email Manager  
202-273-0201  
[rmira@nlrb.gov](mailto:rmira@nlrb.gov)

---

**From:** Aburvasamy, Prem <Prem.Aburvasamy@nlrb.gov>  
**Sent:** Thursday, February 11, 2021 4:08 PM  
**To:** Mira, Robert <Robert.Mira@nlrb.gov>; Marks, Eric <Eric.marks@nlrb.gov>; Daniel, Sharon <Sharon.Daniel@nlrb.gov>  
**Cc:** Troutman, Richard D. <Richard.Troutman@nlrb.gov>  
**Subject:** RE: Updating list of Capstone Officials

We may have to review the Capstone policy and edit the Positions. Thanks.

---

**From:** Mira, Robert <[Robert.Mira@nlrb.gov](mailto:Robert.Mira@nlrb.gov)>  
**Sent:** Thursday, February 11, 2021 4:01 PM  
**To:** Aburvasamy, Prem <[Prem.Aburvasamy@nlrb.gov](mailto:Prem.Aburvasamy@nlrb.gov)>; Marks, Eric <[Eric.marks@nlrb.gov](mailto:Eric.marks@nlrb.gov)>; Daniel, Sharon <[Sharon.Daniel@nlrb.gov](mailto:Sharon.Daniel@nlrb.gov)>  
**Cc:** Troutman, Richard D. <[Richard.Troutman@nlrb.gov](mailto:Richard.Troutman@nlrb.gov)>  
**Subject:** Updating list of Capstone Officials

I'm reviewing and updating the Capstone Officials list for email retention and I need your help to identify the proper names.

Can you give me the names for the users in the following positions which should be Capstone Officials as of today?

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**Director of the Office of Congressional and Public Affairs; - Edwin Egee (was the director) Now vacant**

**Associate to the General Counsel of Operations-Management – Beth Tursell**

**Associate General Counsels of Operations-Management, - not sure if this position exists now.**

Thanks

Robert Mira  
NLRB Email Manager  
202-273-0201  
[rmira@nrlb.gov](mailto:rmira@nrlb.gov)

**From:** Marks\_Eric  
**To:** Aburvasamy\_Prem; Williams\_Kenneth J.  
**Cc:** Pojeta\_Thomas J.  
**Subject:** FW: Capstone Reminder Guidance – New Agency Email Retention Policies  
**Date:** Friday, February 26, 2021 5:38:13 PM  
**Attachments:** Capstone Reminder Memo Final 7-6-17.pdf

---

I found an old Capstone announcement. I was sure if this the latest. I noticed one of the links referenced in the document no longer exists.

[https://nlrb.sharepoint.com/DofA/APProcedures%20Manual/appm\\_it-4\\_protection\\_of\\_sensitive\\_information.pdf](https://nlrb.sharepoint.com/DofA/APProcedures%20Manual/appm_it-4_protection_of_sensitive_information.pdf)

**The relevant language from the Capstone memo is reproduced below. Please see the attached memo for the full explanation of the new e-mail management policy.**

To the extent that users have particular emails they wish to retain as historical records, instructions from management will be distributed shortly regarding the criteria for determining which emails may be retained, as well as where those emails may be retained outside of the Agency's email system. *Other than these limited email records, "non-Capstone" custodians are instructed to not remove Agency email records from the Agency's email system prior to policy implementation. For example, saving Agency email records beyond those which meet the criteria for longer retention to an external location negates and circumvents the effect of the new email retention policies.* Non-compliance with the "Capstone" policy will require expanded searches by the Agency to fully respond to FOIA requests, Congressional inquiries, and matters in litigation, creating additional costs and legal risk. Non-compliance also exposes the Agency to legal liability and possible sanctions for failing to comply with the Agency's published email retention standards.

**The Administrative Policies and Procedures Manual -- Protection of Sensitive Agency Information (Effective 7/31/2007) is found here:**

[https://nlrb.sharepoint.com/DofA/APProcedures%20Manual/appm\\_it-4\\_protection\\_of\\_sensitive\\_information.pdf](https://nlrb.sharepoint.com/DofA/APProcedures%20Manual/appm_it-4_protection_of_sensitive_information.pdf)

Respectfully,  
Eric

---

**From:** Aburvasamy, Prem <Prem.Aburvasamy@nlrb.gov>  
**Sent:** Thursday, July 6, 2017 9:14 AM  
**To:** ML-NLRB-Everyone (R) <ML-NLRB-Everyone@nlrb.gov>  
**Subject:** Capstone Reminder Guidance – New Agency Email Retention Policies

All,

This message is a reminder of the NLRB's data management practices following the June 1<sup>st</sup> implementation of the Capstone email retention policy. Specifically, this message is to remind all Agency employees that emails are to be retained in appropriate and identified Agency electronic systems that support records management and litigation requirements including the ability to identify, retrieve, and retain the records for as long as they are needed.

Please read the attached Memo for additional information.

Thanks.  
Prem

Prem Aburvasamy | Chief Information Officer  
National Labor Relations Board (NLRB)  
1015 Half Street SE | Washington, DC 20570  
[prem.aburvasamy@nlrb.gov](mailto:prem.aburvasamy@nlrb.gov) | 202-273-3925

**From:** [Mira, Robert](#)  
**To:** [Williams, Kenneth J.](#)  
**Cc:** [Troutman, Richard D.](#); [Lambeth, Christopher W.](#); [Pojeta, Thomas J.](#)  
**Subject:** RE: NATIONAL ARCHIVES AND RECORDS ADMINISTRATION (NARA) SELF-ASSESEMENT QUESTIONS  
**Date:** Monday, March 1, 2021 10:43:37 AM

---

I believe it was Barbara O'Neill who said that they would notify me whenever there were changes to the Capstone Officials but I don't have it in writing.

Robert Mira  
NLRB Email Manager  
202-273-0201  
[rmira@nlrb.gov](mailto:rmira@nlrb.gov)

---

**From:** Mira, Robert  
**Sent:** Monday, March 1, 2021 10:14 AM  
**To:** Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>  
**Cc:** Troutman, Richard D. <[Richard.Troutman@nlrb.gov](mailto:Richard.Troutman@nlrb.gov)>; Lambeth, Christopher W. <[Christopher.Lambeth@nlrb.gov](mailto:Christopher.Lambeth@nlrb.gov)>; Pojeta, Thomas J. <[Thomas.Pojeta@nlrb.gov](mailto:Thomas.Pojeta@nlrb.gov)>  
**Subject:** RE: NATIONAL ARCHIVES AND RECORDS ADMINISTRATION (NARA) SELF-ASSESEMENT QUESTIONS

Let me look through my emails but she already left the agency.

I don't think I have it in writing in an email but let me check.

Robert Mira  
NLRB Email Manager  
202-273-0201  
[rmira@nlrb.gov](mailto:rmira@nlrb.gov)

---

**From:** Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>  
**Sent:** Monday, March 1, 2021 10:10 AM  
**To:** Mira, Robert <[Robert.Mira@nlrb.gov](mailto:Robert.Mira@nlrb.gov)>  
**Cc:** Troutman, Richard D. <[Richard.Troutman@nlrb.gov](mailto:Richard.Troutman@nlrb.gov)>; Lambeth, Christopher W. <[Christopher.Lambeth@nlrb.gov](mailto:Christopher.Lambeth@nlrb.gov)>; Pojeta, Thomas J. <[Thomas.Pojeta@nlrb.gov](mailto:Thomas.Pojeta@nlrb.gov)>  
**Subject:** RE: NATIONAL ARCHIVES AND RECORDS ADMINISTRATION (NARA) SELF-ASSESEMENT QUESTIONS

Robert,

Regarding your response associated with question #66, as you recall we had a number of stakeholders involved with finalizing the Capstone email schedule. Do you remember who verbally agreed to provide OCIO with changes to the Capstone Official list? If you provide me with the name or office I can reach-out to them so we can start a process for notifications.

Very Respectfully,

Kenneth J. Williams  
Records Officer  
OCIO, National Labor Relations Board  
1015 Half Street S.E. Suite 3071  
Washington, DC 20570  
(202)273-2833

---

**From:** Mira, Robert <[Robert.Mira@nlrb.gov](mailto:Robert.Mira@nlrb.gov)>

**Sent:** Monday, March 1, 2021 9:43 AM

**To:** Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>; Pojeta, Thomas J. <[Thomas.Pojeta@nlrb.gov](mailto:Thomas.Pojeta@nlrb.gov)>

**Cc:** Troutman, Richard D. <[Richard.Troutman@nlrb.gov](mailto:Richard.Troutman@nlrb.gov)>; Lambeth, Christopher W. <[Christopher.Lambeth@nlrb.gov](mailto:Christopher.Lambeth@nlrb.gov)>

**Subject:** RE: NATIONAL ARCHIVES AND RECORDS ADMINISTRATION (NARA) SELF-ASSESEMENT QUESTIONS

Here are my comments

37. Does your agency's email system(s) retain the intelligent full names on directories or distribution lists to ensure identification of the sender and addressee(s) for those email messages that are Federal records? (36 CFR 1236.22(a)(3))

(b) (5)

(b) (5)

If required, could NARA provide guidance on how other agencies are accomplishing it?

38. What method(s) does your agency employ to capture and manage email records? (**Choose all that apply**)

(b) (5)

(b) (5)

66. If 'GRS 6.1: Email Managed under a Capstone Approach; agency has an approved form NA- 1005' (to Q63): Does your agency track changes in Capstone accounts to ensure they

are accurate and complete?

(b) (5)

Reason: (b) (5)

67. If Yes or To some extent: Please explain how your agency tracks changes to Capstone accounts. *(Be specific)*

(b) (5)

Robert Mira  
NLRB Email Manager  
202-273-0201  
[rmira@nrlb.gov](mailto:rmira@nrlb.gov)

---

**From:** Williams, Kenneth J. <[Kenneth.Williams@nrlb.gov](mailto:Kenneth.Williams@nrlb.gov)>

**Sent:** Monday, March 1, 2021 9:15 AM

**To:** Mira, Robert <[Robert.Mira@nrlb.gov](mailto:Robert.Mira@nrlb.gov)>; Pojeta, Thomas J. <[Thomas.Pojeta@nrlb.gov](mailto:Thomas.Pojeta@nrlb.gov)>

**Cc:** Troutman, Richard D. <[Richard.Troutman@nrlb.gov](mailto:Richard.Troutman@nrlb.gov)>; Lambeth, Christopher W. <[Christopher.Lambeth@nrlb.gov](mailto:Christopher.Lambeth@nrlb.gov)>

**Subject:** NATIONAL ARCHIVES AND RECORDS ADMINISTRATION (NARA) SELF-ASSESEMENT QUESTIONS

Leaders,

Request your assistance. I have provided preliminary responses to the following question that are listed on the 2020 Records Management Self-Assessment. Please verify that the answers are correct for questions 37, 38 and 66. For question 39 and 40, can you point me to the individual(s) that can provide me with the answer? Regarding question #74, (b) (5)

The Assessment is due to NARA 19 March. Your assistance is greatly appreciated. Thanks in advance.

37. Does your agency's email system(s) retain the intelligent full names on directories or distribution lists to ensure identification of the sender and addressee(s) for those email



messages that are Federal records? (36 CFR 1236.22(a)(3))

(b) (5)



38. What method(s) does your agency employ to capture and manage email records? (**Choose all that apply**)

(b) (5)



39. What new method(s) to create and maintain data are being explored and/or employed by your agency that will impact records management? (**Choose all that apply**)

(For more information on these topics see:

[https://www.archives.gov/files/records- mgmt/policy/nara-cognitive-technologies-whitepaper.pdf](https://www.archives.gov/files/records-mgmt/policy/nara-cognitive-technologies-whitepaper.pdf))

- ☐ Smart devices
- ☐ Sensors that collect and transmit data
- ☐ Geographic Information Systems
- ☐ Robotic Process Automation
- ☐ Software Robot or Bot
- ☐ Supervised Machine Learning
- ☐ Unsupervised Machine Learning
- ☐ Reinforced Machine Learning
- ☐ Standard Artificial Intelligence
- ☐ Open-source Artificial Intelligence
- ☐ Auto-classification
- ☐ Other, please be specific
- ☐ My agency is not exploring and/or employing

40. Please add any additional comments about your agency for Section III. (Optional)

66. If 'GRS 6.1: Email Managed under a Capstone Approach; agency has an approved form NA- 1005' (to Q63): Does your agency track changes in Capstone accounts to ensure they are accurate and complete?

(b) (5)



67. If Yes or To some extent: Please explain how your agency tracks changes to Capstone accounts. (*Be specific*)

(b) (5)

73. Did your agency take steps to capture and disposition web records in preparation for an administration change?

(b) (5)

74. If Yes or No: Please explain your response to the previous question. *(If you answered "Yes," please be specific on steps taken to capture, preserve, and prepare web records in preparation for an administration change. If you answered "No," please explain why not, including any challenges.)*

Very Respectfully,

Kenneth J. Williams  
Records Officer  
OCIO, National Labor Relations Board  
1015 Half Street S.E. Suite 3071  
Washington, DC 20570  
(202)273-2833

**From:** Marks\_Eric  
**To:** Aburvasamy\_Prem; Williams\_Kenneth J.  
**Cc:** Pojeta\_Thomas J.  
**Subject:** FW: Capstone Reminder Guidance – New Agency Email Retention Policies  
**Date:** Friday, February 26, 2021 5:38:13 PM  
**Attachments:** Capstone Reminder Memo Final 7-6-17.pdf

---

I found an old Capstone announcement. I was sure if this the latest. I noticed one of the links referenced in the document no longer exists.

[https://nlrb.sharepoint.com/DofA/APProcedures%20Manual/appm\\_it-4\\_protection\\_of\\_sensitive\\_information.pdf](https://nlrb.sharepoint.com/DofA/APProcedures%20Manual/appm_it-4_protection_of_sensitive_information.pdf)

**The relevant language from the Capstone memo is reproduced below. Please see the attached memo for the full explanation of the new e-mail management policy.**

To the extent that users have particular emails they wish to retain as historical records, instructions from management will be distributed shortly regarding the criteria for determining which emails may be retained, as well as where those emails may be retained outside of the Agency's email system. *Other than these limited email records, "non-Capstone" custodians are instructed to not remove Agency email records from the Agency's email system prior to policy implementation. For example, saving Agency email records beyond those which meet the criteria for longer retention to an external location negates and circumvents the effect of the new email retention policies.* Non-compliance with the "Capstone" policy will require expanded searches by the Agency to fully respond to FOIA requests, Congressional inquiries, and matters in litigation, creating additional costs and legal risk. Non-compliance also exposes the Agency to legal liability and possible sanctions for failing to comply with the Agency's published email retention standards.

**The Administrative Policies and Procedures Manual -- Protection of Sensitive Agency Information (Effective 7/31/2007) is found here:**

[https://nlrb.sharepoint.com/DofA/APProcedures%20Manual/appm\\_it-4\\_protection\\_of\\_sensitive\\_information.pdf](https://nlrb.sharepoint.com/DofA/APProcedures%20Manual/appm_it-4_protection_of_sensitive_information.pdf)

Respectfully,  
Eric

---

**From:** Aburvasamy, Prem <Prem.Aburvasamy@nlrb.gov>  
**Sent:** Thursday, July 6, 2017 9:14 AM  
**To:** ML-NLRB-Everyone (R) <ML-NLRB-Everyone@nlrb.gov>  
**Subject:** Capstone Reminder Guidance – New Agency Email Retention Policies

All,

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Please read the attached Memo for additional information.

Thanks.  
Prem

Prem Aburvasamy | Chief Information Officer  
National Labor Relations Board (NLRB)  
1015 Half Street SE | Washington, DC 20570  
[prem.aburvasamy@nlrb.gov](mailto:prem.aburvasamy@nlrb.gov) | 202-273-3925

**From:** [Marks, Eric](#)  
**To:** [Aburvasamy, Prem](#)  
**Subject:** FW: Capstone instructions  
**Date:** Monday, March 8, 2021 5:12:11 PM  
**Attachments:** [Capstone Instructions and attachment 5-1-17 \(003\) \(3\).pdf](#)

---

Prem,

FYI. I found this but I think there should be an official posting somewhere (?). Awaiting Ken's reply. In the meantime I'll see how to clean up Active Directory to support automatic assignment based on employee title.

Respectfully,  
Eric

---

**From:** Domally, Anissa [CONTRACTOR] <Anissa.Domally@nlrb.gov>  
**Sent:** Tuesday, September 24, 2019 1:14 PM  
**To:** Marks, Eric <Eric.marks@nlrb.gov>  
**Subject:** Capstone instructions

Anissa Domally  
NLRB Service Desk  
Regular Hours: 7:30AM EST- 6:00PM EST Monday-Friday, excluding Federal Holidays  
After Hours: 6:00PM EST- 9:00PM EST Monday-Friday, excluding Federal Holidays  
1015 Half Street SE,  
Washington DC 20570  
Phone: 202.273.3333  
Email: [Helpdesk@nlrb.gov](mailto:Helpdesk@nlrb.gov)

**From:** [Williams, Kenneth J.](#)  
**To:** [Marks, Eric](#)  
**Cc:** [Troutman, Richard D.](#); [Aburvasamy, Prem](#); [Mira, Robert](#); [Lambeth, Christopher W.](#)  
**Subject:** RE: Capstone  
**Date:** Monday, March 8, 2021 6:22:17 PM  
**Attachments:** [APPM-REC-5 \(3\).pdf](#)

---

Sir,

All the positions and roles are listed in the Email/Capstone APPM(attached). Paragraph 5, subparagraph (a). Regional Directors are not included.

Very Respectfully,

Kenneth J. Williams  
Records Officer  
OCIO, National Labor Relations Board  
1015 Half Street S.E. Suite 3071  
Washington, DC 20570  
(202)273-2833

---

**From:** Marks, Eric <Eric.marks@nlrb.gov>  
**Sent:** Monday, March 8, 2021 5:08 PM  
**To:** Williams, Kenneth J. <Kenneth.Williams@nlrb.gov>  
**Cc:** Troutman, Richard D. <Richard.Troutman@nlrb.gov>; Aburvasamy, Prem <Prem.Aburvasamy@nlrb.gov>; Mira, Robert <Robert.Mira@nlrb.gov>  
**Subject:** RE: Capstone

Ken,

Is there a definitive list of the Agency titles/roles identified as Capstone designated?

At one point I thought there was discussion of Regional Director inclusion.

Respectfully,  
Eric

---

**From:** Aburvasamy, Prem <[Prem.Aburvasamy@nlrb.gov](mailto:Prem.Aburvasamy@nlrb.gov)>  
**Sent:** Monday, March 8, 2021 5:04 PM  
**To:** Mira, Robert <[Robert.Mira@nlrb.gov](mailto:Robert.Mira@nlrb.gov)>  
**Cc:** Marks, Eric <[Eric.marks@nlrb.gov](mailto:Eric.marks@nlrb.gov)>; Troutman, Richard D. <[Richard.Troutman@nlrb.gov](mailto:Richard.Troutman@nlrb.gov)>  
**Subject:** Capstone

Robert,

Currently we have Peter Ohr and Meredith as Acting GC and Acting Deputy GC. They both should be placed under “Capstone custodian”. I don’t know how we can define someone as a Capstone custodian for a certain period. Both Peter and Meredith are not currently capstone custodian.

Thanks.

Prem

Prem Aburvasamy | Chief Information Officer

National Labor Relations Board (NLRB)

1015 Half Street SE | Washington, DC 20570

[prem.aburvasamy@nlrb.gov](mailto:prem.aburvasamy@nlrb.gov) | 202-273-3925

**From:** [Ephraim Virginia](#)  
**To:** [Williams Kenneth J.](#); [Gaston David](#)  
**Cc:** [Lambeth Christopher W.](#)  
**Subject:** RE: Capstone Reminder Guidance – New Agency Email Retention Policies  
**Date:** Tuesday, March 9, 2021 4:10:18 PM  
**Attachments:** [Capstone Reminder Memo Final 7-6-17 VE Comments.pdf](#)

---

Ken,

I reviewed all the docs and have a comment for the attached memo (includes the correct link in the comments box). Thanks.

VR,  
Virginia

---

**From:** Ephraim, Virginia  
**Sent:** Monday, March 8, 2021 10:11 AM  
**To:** Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>; Gaston, David <[David.Gaston@nlrb.gov](mailto:David.Gaston@nlrb.gov)>  
**Cc:** Lambeth, Christopher W. <[Christopher.Lambeth@nlrb.gov](mailto:Christopher.Lambeth@nlrb.gov)>  
**Subject:** RE: Capstone Reminder Guidance – New Agency Email Retention Policies

Will do, Ken.

VR,  
Virginia

---

**From:** Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>  
**Sent:** Monday, March 8, 2021 8:12 AM  
**To:** Gaston, David <[David.Gaston@nlrb.gov](mailto:David.Gaston@nlrb.gov)>; Ephraim, Virginia <[Virginia.Ephraim@nlrb.gov](mailto:Virginia.Ephraim@nlrb.gov)>  
**Cc:** Lambeth, Christopher W. <[Christopher.Lambeth@nlrb.gov](mailto:Christopher.Lambeth@nlrb.gov)>  
**Subject:** FW: Capstone Reminder Guidance – New Agency Email Retention Policies

Good Morning David and Virginia,

David, Prem has directed me to review the Capstone Policy. I thank it is best that we review all Capstone Memorandums and develop an APPM that includes language used in each one if need be. Can you assist me with reviewing the language regarding litigation holds, FOIA and the process described in each memo, specifically the memo dated (5-1-17) for relevancy now. Also, I thought we had a mechanism in place or a designee that would notify the Agency's Email Manager when there are changes or additions to the Capstone List. Lastly, I think the final product will have to be reviewed by Special Counsel. Is that correct? Can you check your schedule for next week and let me know of your availability so that we can discuss in detail? Thanks in advance.

Virginia,

Can you check the PII references in the attached memorandums. Additionally, the link to the APPM -Protection of Sensitive Agency Information is disconnected. See attached memo (7-6-17). Thanks in advance.

Very Respectfully,

Kenneth J. Williams  
Records Officer  
OCIO, National Labor Relations Board  
1015 Half Street S.E. Suite 3071  
Washington, DC 20570  
(202)273-2833

---

**From:** Aburvasamy, Prem <[Prem.Aburvasamy@nlrb.gov](mailto:Prem.Aburvasamy@nlrb.gov)>  
**Sent:** Sunday, March 7, 2021 6:38 PM  
**To:** Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>  
**Cc:** Marks, Eric <[Eric.marks@nlrb.gov](mailto:Eric.marks@nlrb.gov)>; Lambeth, Christopher W. <[Christopher.Lambeth@nlrb.gov](mailto:Christopher.Lambeth@nlrb.gov)>  
**Subject:** FW: Capstone Reminder Guidance – New Agency Email Retention Policies

Hi Ken,



Let's review and modify the policy – not sure if we have any new positions that has to be designated as Capstone.

Thanks.  
Prem

---

**From:** Marks, Eric <[Eric.marks@nlrb.gov](mailto:Eric.marks@nlrb.gov)>  
**Sent:** Friday, February 26, 2021 5:37 PM  
**To:** Aburvasamy, Prem <[Prem.Aburvasamy@nlrb.gov](mailto:Prem.Aburvasamy@nlrb.gov)>; Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>  
**Cc:** Pojeta, Thomas J. <[Thomas.Pojeta@nlrb.gov](mailto:Thomas.Pojeta@nlrb.gov)>  
**Subject:** FW: Capstone Reminder Guidance – New Agency Email Retention Policies

I found an old Capstone announcement. I was sure if this the latest. I noticed one of the links referenced in the document no longer exists.

[https://nlrb.sharepoint.com/DofA/APProcedures%20Manual/appm\\_it-4\\_protection\\_of\\_sensitive\\_information.pdf](https://nlrb.sharepoint.com/DofA/APProcedures%20Manual/appm_it-4_protection_of_sensitive_information.pdf)

**The relevant language from the Capstone memo is reproduced below. Please see the attached memo for the full explanation of the new e-mail management policy.**

To the extent that users have particular emails they wish to retain as historical records, instructions from management will be distributed shortly regarding the criteria for determining which emails may be retained, as well as where those emails may be retained outside of the Agency's email system. *Other than these limited email records, "non-Capstone" custodians are instructed to not remove Agency email records from the Agency's email system prior to policy implementation. For example, saving Agency email records beyond those which meet the criteria for longer retention to an external location negates and circumvents the effect of the new email retention policies.* Non-compliance with the "Capstone" policy will require expanded searches by the Agency to fully respond to FOIA requests, Congressional inquiries, and matters in litigation, creating additional costs and legal risk. Non-compliance also exposes the Agency to legal liability and possible sanctions for failing to comply with the Agency's published email retention standards.

**The Administrative Policies and Procedures Manual -- Protection of Sensitive Agency Information (Effective 7/31/2007) is found here:**

[https://nlrb.sharepoint.com/DofA/APProcedures%20Manual/appm\\_it-4\\_protection\\_of\\_sensitive\\_information.pdf](https://nlrb.sharepoint.com/DofA/APProcedures%20Manual/appm_it-4_protection_of_sensitive_information.pdf)

Respectfully,  
Eric

---

**From:** Aburvasamy, Prem <[Prem.Aburvasamy@nlrb.gov](mailto:Prem.Aburvasamy@nlrb.gov)>  
**Sent:** Thursday, July 6, 2017 9:14 AM  
**To:** ML-NLRB-Everyone (R) <[ML-NLRB-Everyone@nlrb.gov](mailto:ML-NLRB-Everyone@nlrb.gov)>  
**Subject:** Capstone Reminder Guidance – New Agency Email Retention Policies

All,

This message is a reminder of the NLRB's data management practices following the June 1<sup>st</sup> implementation of the Capstone email retention policy. Specifically, this message is to remind all Agency employees that emails are to be retained in appropriate and identified Agency electronic systems that support records management and litigation requirements including the ability to identify, retrieve, and retain the records for as long as they are needed.

Please read the attached Memo for additional information.

Thanks.  
Prem



Prem Aburvasamy | Chief Information Officer  
National Labor Relations Board (NLRB)  
1015 Half Street SE | Washington, DC 20570  
[prem.aburvasamy@nrlb.gov](mailto:prem.aburvasamy@nrlb.gov) | 202-273-3925

**From:** [Marks, Eric](#)  
**To:** [Mira, Robert](#)  
**Cc:** [Troutman, Richard D.](#); [Aburvasamy, Prem](#); [Williams, Kenneth J.](#); [Daniel, Sharon](#); [Adewunmi, Taiwo O.](#)  
**Subject:** RE: List of Users With Capstone Policy Applied  
**Date:** Monday, March 15, 2021 10:34:14 AM

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Robert,  
Much appreciated, as always!

Respectfully,  
Eric

---

**From:** Mira, Robert <Robert.Mira@nlrb.gov>  
**Sent:** Monday, March 15, 2021 9:28 AM  
**To:** Marks, Eric <Eric.marks@nlrb.gov>  
**Cc:** Troutman, Richard D. <Richard.Troutman@nlrb.gov>; Aburvasamy, Prem <Prem.Aburvasamy@nlrb.gov>; Williams, Kenneth J. <Kenneth.Williams@nlrb.gov>; Daniel, Sharon <Sharon.Daniel@nlrb.gov>  
**Subject:** RE: List of Users With Capstone Policy Applied

See attached .csv list created from PowerShell..

Robert Mira  
NLRB Email Manager  
202-273-0201  
[rmira@nlrb.gov](mailto:rmira@nlrb.gov)

---

**From:** Mira, Robert  
**Sent:** Monday, March 15, 2021 8:02 AM  
**To:** Marks, Eric <[Eric.marks@nlrb.gov](mailto:Eric.marks@nlrb.gov)>  
**Cc:** Troutman, Richard D. <[Richard.Troutman@nlrb.gov](mailto:Richard.Troutman@nlrb.gov)>; Aburvasamy, Prem <[Prem.Aburvasamy@nlrb.gov](mailto:Prem.Aburvasamy@nlrb.gov)>; Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>; Daniel, Sharon <[Sharon.Daniel@nlrb.gov](mailto:Sharon.Daniel@nlrb.gov)>  
**Subject:** RE: List of Users With Capstone Policy Applied

There is no report but I'll see if I can the list through Powershell.

Robert Mira  
NLRB Email Manager  
202-273-0201  
[rmira@nlrb.gov](mailto:rmira@nlrb.gov)

---

**From:** Marks, Eric <[Eric.marks@nlrb.gov](mailto:Eric.marks@nlrb.gov)>  
**Sent:** Friday, March 12, 2021 4:02 PM  
**To:** Mira, Robert <[Robert.Mira@nlrb.gov](mailto:Robert.Mira@nlrb.gov)>  
**Cc:** Troutman, Richard D. <[Richard.Troutman@nlrb.gov](mailto:Richard.Troutman@nlrb.gov)>; Aburvasamy, Prem

<[Prem.Aburvasamy@nlrb.gov](mailto:Prem.Aburvasamy@nlrb.gov)>; Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>; Daniel, Sharon <[Sharon.Daniel@nlrb.gov](mailto:Sharon.Daniel@nlrb.gov)>

**Subject:** List of Users With Capstone Policy Applied

Robert,

Is there a report of list of users that currently have the Capstone policy applied?

I receive the titles associated with “requires Capstone”. I want to use the list of users to determine if Active Directory attributes may be available to automatically identify users moving forward.

I don’t think O365 supports assigning retention policies based on a user’s AD attribute, but we could use ServiceNow to initiate the task to assign the policy as people on board or change titles.

The below snippet is from our APPM for mandatory users:

These “Capstone” Officials include the:

- Chairman and Board members;
- Chief of Staff to the Chairman;
- The Solicitor;
- The Executive Secretary;
- Chief Counsels to Board Members;
- Chief Information Officer;
- General Counsel;
- Deputy General Counsel
- The Executive Assistant to the General Counsel;
- The Associate General Counsels of:
  - Operations-Management, Advice, Enforcement-Litigation, and Legal Counsel;
- Associate to the General Counsel of Operations-Management;
- The Chief Financial Officer;
- The Director of Administration.

Respectfully,

\*\*\*\*\*

**Eric Marks**

**Deputy Chief Information Officer**

**National Labor Relations Board**

**1015 Half Street, SE, Room 3090**

**Washington, D.C, 20003**

**From:** [Williams, Kenneth J.](#)  
**To:** [Marks, Eric](#); [Lambeth, Christopher W.](#)  
**Cc:** [Aburvasamy, Prem](#); [Troutman, Richard D.](#); [Mira, Robert](#)  
**Subject:** RE: FW: Political Appointees/Senior Officials  
**Date:** Monday, April 5, 2021 12:11:24 PM  
**Attachments:** [GRS 6.1-0025-2018-0001-Approved.pdf](#)  
[image001.png](#)  
[image002.png](#)

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Sir,

In regards to Non-Capstone Official's the stakeholders that took part in approving the attached schedule agreed that all emails should be purged when 7 years old. Regarding the transfer of Capstone Official's email, the Capstone Schedule we submitted for approval to NARA, indicated in our transfer instructions that we would transfer Capstone Official emails after 20 years. Our options were 15 or 20, the stakeholder chose 20 years. For legacy records, we indicated that no legacy email exists for this agency, as traditional records were managed with a print-and-file policy enforced prior to Capstone adoption. I hope this response answers the mail.

Very Respectfully,  
Kenneth J. Williams  
Records Officer  
OCIO, National Labor Relations Board  
1015 Half Street S.E. Suite 3071  
Washington, DC 20570  
(202)273-2833

---

**From:** Marks, Eric <Eric.marks@nlrb.gov>  
**Sent:** Monday, April 5, 2021 11:37 AM  
**To:** Williams, Kenneth J. <Kenneth.Williams@nlrb.gov>; Lambeth, Christopher W. <Christopher.Lambeth@nlrb.gov>  
**Cc:** Aburvasamy, Prem <Prem.Aburvasamy@nlrb.gov>; Troutman, Richard D. <Richard.Troutman@nlrb.gov>; Mira, Robert <Robert.Mira@nlrb.gov>  
**Subject:** RE: FW: Political Appointees/Senior Officials

Ken,  
Thank you. What is NARA recommendation to the "others" – can we purge them?  
Also – why is it only "prior". Please explain. My understanding is "records" are transferred after 7 years of old, or for Capstone – immediately.

Robert and I provided the full list. Please provide a status of actions "per" individual so that we may begin activities.

Peter C. Schaumber <sup>17</sup>
Dennis P. Walsh <sup>20</sup>
<a href="#">Craig Becker</a> <sup>21</sup>
<a href="#">Mark G. Pearce</a> <sup>22</sup>
<a href="#">Brian Hayes</a> <sup>23</sup>
<a href="#">Sharon Block</a> <sup>24</sup>
<a href="#">Terence F. Flynn</a> <sup>24</sup>
Richard F. Griffin, Jr. <sup>24</sup>
<a href="#">Nancy J. Schiffer</a>
<a href="#">Kent Y. Hirozawa</a>
<a href="#">Philip A. Miscimarra</a>
<a href="#">Harry I. Johnson, III</a>
<a href="#">Lauren McFerran</a>
<a href="#">Marvin E. Kaplan</a>
<a href="#">William J. Emanuel</a>
<a href="#">John F. Ring</a>
<a href="#">Lauren McFerran</a>

Respectfully,  
Eric

---

**From:** Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>  
**Sent:** Monday, April 5, 2021 11:31 AM  
**To:** Marks, Eric <[Eric.marks@nlrb.gov](mailto:Eric.marks@nlrb.gov)>; Mira, Robert <[Robert.Mira@nlrb.gov](mailto:Robert.Mira@nlrb.gov)>  
**Cc:** Aburvasamy, Prem <[Prem.Aburvasamy@nlrb.gov](mailto:Prem.Aburvasamy@nlrb.gov)>; Troutman, Richard D. <[Richard.Troutman@nlrb.gov](mailto:Richard.Troutman@nlrb.gov)>; Lambeth, Christopher W. <[Christopher.Lambeth@nlrb.gov](mailto:Christopher.Lambeth@nlrb.gov)>  
**Subject:** FW: FW: Political Appointees/Senior Officials

Eric,

We are only required to send the emails of any individuals listed below or any others that departed

prior to 2001. According to our agency assigned Archivist Mr. David Webber. All Officials who departed after 2001 emails are not eligible for transfer for 20 years per our NARA Approved Capstone Schedule.

1. Philip Miscimarra
2. Mark Pearce
3. Richard Griffin
4. Jennifer Abruzzo
5. Peter Robb (may have to have a copy of the email until cleared)
6. Alice Stock (may have to have a copy of the email until cleared)
7. John Kyle

Please note, David mentioned a previous comment by Mr. Brett Abrams (NARA IT Tech) when this subject was previously discussed in January, that

*"it may be a little premature to establish a process for transfer since it will be many years from now. Generally, agencies have used their records management system to segregate the emails to be transferred then uploaded them to our SFTP site for us to download. Agencies have sent the records in eml as individual emails or pst for aggregated emails".*

Very Respectfully,

Kenneth J. Williams

Records Officer

OCIO, National Labor Relations Board

1015 Half Street S.E. Suite 3071

Washington, DC 20570

(202)273-2833

---

**From:** David Weber <[david.weber@nara.gov](mailto:david.weber@nara.gov)>

**Sent:** Monday, April 5, 2021 6:46 AM

**To:** Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>

**Subject:** Re: FW: Political Appointees/Senior Officials

Hi Kenneth: Your Capstone schedule has a 20 year inactive phase before you can transfer the records to us. That means records for officials who separated before 2001 are eligible for transfer. If these records don't meet that requirement, I got the following suggestion about your question from Brett Abrams earlier this year: *it may be a little premature to establish a process for transfer since it will be many years from now. Generally, agencies have used their records management system to segregate the emails to be transferred then uploaded them to our SFTP site for us to download. Agencies have sent the records in eml as individual emails or pst for aggregated emails. This is discussed here: <https://www.archives.gov/records-mgmt/policy/transfer-guidance-tables.html>* All mods that you need to make for your schedule would be done with David.

David

On Fri, Apr 2, 2021 at 10:37 AM Williams, Kenneth J. <[Kenneth.Williams@nrlb.gov](mailto:Kenneth.Williams@nrlb.gov)> wrote:

Good Morning David,

We would like to archive email records of all former political appointees that have left NLRB and send it to NARA. This applies to all capstone designated officials since we implemented the Capstone Policy. How can we accomplish this? Is this done by copying PST files to a thumb drive or something?

Here are the Political Appointees that I remember:

1. Philip Miscimarra
2. Mark Pearce
3. Richard Griffin
4. Jennifer Abruzzo
5. Peter Robb (may have to have a copy of the email until cleared)
6. Alice Stock (may have to have a copy of the email until cleared)
7. John Kyle

Please provide guidance or forward this email to NARA Tech Team so that can provide assistance.

Thanks in advance.

Very Respectfully,

Kenneth J. Williams

Records Officer

OCIO, National Labor Relations Board

1015 Half Street S.E. Suite 3071

Washington, DC 20570


(202)273-2833

**From:** [Williams, Kenneth J.](#)  
**To:** [Mira, Robert](#)  
**Cc:** [Aburvasamy, Prem](#)  
**Subject:** FW: INC0255496 - User looking for approval to open .pst files  
**Date:** Thursday, June 10, 2021 11:13:43 AM

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Robert,

(b) (5), (b) (7)(E)

A large rectangular area of the email body is completely redacted with black ink, covering approximately four lines of text.

Very Respectfully,


Kenneth J. Williams  
Records Officer  
OCIO, National Labor Relations Board  
1015 Half Street S.E. Suite 3071  
Washington, DC 20570  
(202)273-2833

---

**From:** Gaston, David <David.Gaston@nlrb.gov>  
**Sent:** Thursday, June 10, 2021 11:05 AM  
**To:** Williams, Kenneth J. <Kenneth.Williams@nlrb.gov>  
**Subject:** RE: INC0255496 - User looking for approval to open .pst files


Ken,

(b) (5), (b) (7)(E)

A large rectangular area of the email body is completely redacted with black ink, covering approximately five lines of text.

Depending on the timing, there are two potential outcomes:

1. (b) (5), (b) (7)(E)

A rectangular area of the email body is completely redacted with black ink, covering two lines of text.



(b) (5), (b) (7)(E)

2. (b) (5), (b) (7)(E)

Regards,  
DG

I think it could be done on a temporary basis

---

**From:** Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>  
**Sent:** Thursday, June 10, 2021 8:39 AM  
**To:** Gaston, David <[David.Gaston@nlrb.gov](mailto:David.Gaston@nlrb.gov)>  
**Subject:** FW: INC0255496 - User looking for approval to open .pst files

David,

Request your thought's on this? Mr. Allen wants to use Outlook PST files. As you know that function was disabled when we implemented capstone(I think). Do you recall the issue with PST Flies?

Very Respectfully,

Kenneth J. Williams  
Records Officer  
OCIO, National Labor Relations Board  
1015 Half Street S.E. Suite 3071  
Washington, DC 20570  
(202)273-2833

---

**From:** Mira, Robert <[Robert.Mira@nlrb.gov](mailto:Robert.Mira@nlrb.gov)>  
**Sent:** Thursday, June 10, 2021 7:53 AM  
**To:** Williams, Kenneth J. <[Kenneth.Williams@nlrb.gov](mailto:Kenneth.Williams@nlrb.gov)>  
**Subject:** FW: INC0255496 - User looking for approval to open .pst files

Good Morning

I'm passing this request from a user who wants to use Outlook's .pst files.

As you know the use of .pst files has been disabled.

Still wanted to see if the user's request can be granted since they say is due to a trial.

Records Management and use of .pst files was an issue before.

The user requesting it is Nicholas Allen (nsallen).

Robert Mira  
NLRB Email Manager  
202-273-0201  
[rmira@nlrb.gov](mailto:rmira@nlrb.gov)

---

**From:** Gross, Michael D. [CONTRACTOR] <[Michael.Gross@nlrb.gov](mailto:Michael.Gross@nlrb.gov)>  
**Sent:** Wednesday, June 9, 2021 6:25 PM  
**To:** Domally, Anissa [CONTRACTOR] <[Anissa.Domally@nlrb.gov](mailto:Anissa.Domally@nlrb.gov)>; Mira, Robert <[Robert.Mira@nlrb.gov](mailto:Robert.Mira@nlrb.gov)>  
**Subject:** INC0255496 - User looking for approval to open .pst files

Good Evening,

Nicholas Allen (nsallen) is requesting the ability to access .PST files on his PC. I've created a ticket for Robert for the record. Nicholas has stated he needs access for an upcoming trial. Thanks

Michael Gross  
NLRB Service Desk  
202.273.3333  
Regular Hours: 7:30AM EST- 6:00PM EST Monday-Friday, excluding Federal Holidays  
After Hours: 6:00pm EST- 9:00PM EST Monday-Friday, excluding Federal Holidays  
Email: [servicedesk@nlrb.gov](mailto:servicedesk@nlrb.gov)

**From:** [Williams, Kenneth J.](#)  
**To:** [Wagner, Marissa A.](#)  
**Subject:** FW: GRS 6.1-0025-2018-0001-Approved.pdf  
**Date:** Tuesday, June 29, 2021 8:14:00 AM  
**Attachments:** [GRS 6.1-0025-2018-0001-Approved.pdf](#)  
[Capstone Officials Permanent Email Tier 1 \(15yrs.\).pptx](#)  
[Capstone Temporary Email 7rs Retention plan.pptx](#)

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Mrs. Wagner,

This email was provided as background information for the implementation of Capstone at NLRB.

Very Respectfully,

Kenneth J. Williams  
Records Officer  
OCIO, National Labor Relations Board  
1015 Half Street S.E. Suite 3071  
Washington, DC 20570  
(202)273-2833

---

**From:** Williams, Kenneth J.  
**Sent:** Tuesday, April 6, 2021 11:32 AM  
**To:** Lambeth, Christopher W. <Christopher.Lambeth@nlrb.gov>  
**Subject:** FW: GRS 6.1-0025-2018-0001-Approved.pdf

Chris,

Per our discussion the following information is provided, to include the attached NARA approved Capstone Schedule, the Capstone Official's records transfer plan, and the Temporary Email Retention Plan I provided in 2017. If you have any questions, let's set up a meeting to discuss.

## CAPSTONE AT NLRB

### Background

- NLRB Email Management- In 2017 Agency chose the option of using an automated approach to managing emails. Prior to 2017 the agency was using the print and file system to management emails. Members were printing emails and filing them electronically on their shared Drive or filing in file cabinets.
- The Capstone approach to management of email's was elected as a way of categorizing and scheduling email based on the position of the email account owner. The Capstone approach allowed for the capture of records those of those top agency officials that they agency felt needed to be preserved permanently.
- The NLRB Records Management Committee provided the positions of 30 Officials that were required to have permanent retentions on their email accounts.
- For Agency email account users not identified as Capstone custodians, the Capstone approach will retain all emails for seven years. Email records would be deleted

- perpetually and daily as the seven-year mark is reached. **See attachment.**
- In August 2017 NLRB verified by signing and submitting a verification for implementing GRS 6.1: Email Managed Under a Capstone Approach form to NARA. It was approved by NARA's Chief Records Officer of the United States April 2019.

Action Required for Capstone

NLRB's Capstone Schedule- The schedule describes **Email Records Cutoff Instructions.**

- What are Cutoff Instructions: The cut-off signals the point at which the retention period begins for a particular type of record. Cut-offs are intended to line up with the way the records are typically organized (e.g. by fiscal, calendar, or academic year). For example, during the period that NLRB was printing and filing emails, they would have been filing them in a folder by calendar or fiscal year in some cases.
- In the Agencies NARA approved schedule, our options were to cutoff emails annually or at the end of employee tenure. We indicated at the end of employee tenure.
- We may have to decide on how we will maintain the emails until they are eligible for transfer to NARA. For example, do we cut them off annually during the period that the Capstone Official will be in that position. To do so; it may be easier to separate them when a Capstone Official returns to the Agency to serve in a different role/position.

**Transfer Instructions.** Agencies must also include the transfer instructions to be used for implementation (for example, "transfer when 15 years old" or "transfer when 20 years old"). Transfer time must be between 15 and 25 years when using GRS 6.1, item 010. NLRB indicated that the transfer of email's would be when they are 20 years old. **See attachment.**

*NARA has specific transfer requirements listed at this link.*

[Appendix A: Tables of File Formats | National Archives](#)

Very Respectfully,

Kenneth J. Williams  
Records Officer  
OCIO, National Labor Relations Board  
1015 Half Street S.E. Suite 3071  
Washington, DC 20570  
(202)273-2833